

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 10 A

Further Representations
Policy 14

The listing of Reepham as a Key Service Centre is appropriate, and in respect of para 6.55 has since September 2009 a 6th Form College attached to the High School, but the range of the proposed housing allocation is not appropriate.

In respect of the strategic core guidance, one of the principal reasons for proposing an allocation of 100-200 new homes was because of limited capacity at Aylsham, a designated main town some 7 miles to the west of Reepham, (Reg 25 Public Consultation March 2009 – attached – Doc 1). While this point has not been repeated in the submitted JCS the proposed allocations remain at 100-200 dwellings.

Not only has the GNDP identified a need for 100-200 new dwellings, but Broadland DC in their Draft Site Allocations DPD – Shortlisted Sites (Sept 2009) withdrawn in June 2006 due to the change in Govt, identified two large sites for 450 new dwellings in Reepham, which is significantly more than required under the JCS. (Attached – Doc 2)

The proposed allocation of such a large range is not Justified and creates uncertainty and to be Effective and Soundly Based should be revised to ‘approximately 100 dwellings’.

Hugh Ivins 11 October 2010

- 7.23 **Loddon** has an attractive historical centre providing a range of shops and services with bus links to Norwich and nearby towns. The adjoining village of **Chedgrave** shares those shops and services in addition to having its own. A range of local industrial, business, retail and tourism job opportunities will be encouraged in line with the needs of housing growth. New development of 100-200 dwellings is proposed to 2026, subject to the overcoming of the shortfall in capacity at the high school, although environmental constraints and areas at risk of flood will be significant factors at the site specific stage.
- 7.24 **Poringland** has a dispersed provision of local shops and services. As it has significant housing commitments not built, no new allocations are proposed. It also has limited local job opportunities, so a new local employment area is proposed.
- 7.25 **Reepham** has a range of shops and services, local job opportunities and available employment land. However, its schools are both virtually at capacity and limited capacity at the sewage treatment works also restricts development potential. However, in view of limited capacity at Aylsham, some 100 – 200 new homes are proposed to 2026, with the encouragement of appropriate local job growth. This will require measures to improve local school capacities.
- 7.26 **Wroxham** forms a gateway to the Broads and is adjacent to the larger service centre of Hoveton, across the River Bure in North Norfolk District. While Wroxham's services are limited, its links to Hoveton as a local employment, service and major Broads tourism centre could support the development of some 100 to 200 dwellings by 2026. This is well within utilities capacity limitations taking into account the proposed new housing allocations for some 150 dwellings in North Norfolk District Council's Local Development Framework. Investment may be needed to improve effluent quality, and development must provide improved community facilities.

Key Service centres

Policy 7 explains what key service centres are and the part they play in the strategy. The proposed key service centres are given in policy 7.

Please respond to this question on the form available on www.gndp.org.uk or in the questions booklet.

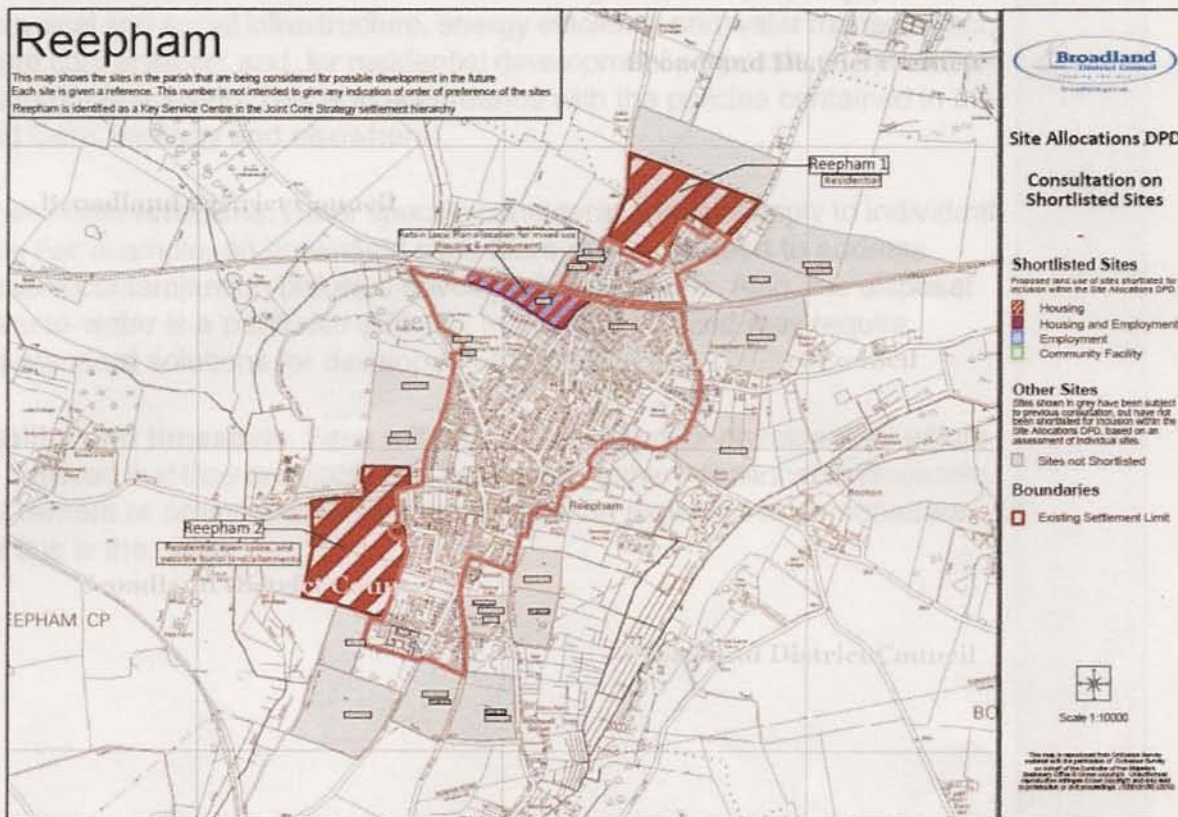
Question 15

Do you agree with the places proposed to be **Key Service Centres** and the part they will play in the strategy? **YES/NO**
If no, please tell us why.

Site Allocations DPD - Shortlisted Sites

Key Service Centres

Reepham



Introduction to Concept Statements

8.12 In addition to identifying sites for development, the Council also intends to produce brief 'concept statements' setting out how a proposed development may be carried out. These may be taken forward as supporting or 'supplementary' documents to provide more detailed guidance on the selected development sites. The main element of the statements is a simple plan that illustrates a possible layout for the site, with the intention being to add explanatory text to give more detail.

8.13 We have produced initial Concept Statements for each of the shortlisted sites in this settlement, and these follow below. We would value your comments on these statements. In particular, we are interested in your views on the following:

- **Site Assets:** Are there any important features or attributes to the site, or nearby, that should be taken into consideration in planning for development on the site?
- **Concept:** The concept plan gives a possible basic idea of how the site might be developed. Is this appropriate or is there a better way of doing it? (nb. In

8 Sco / 10 B.

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 10 B

Further Representations
Policy 14

There is significant uncertainty in respect of the scale of development regarding the proposed allocations for Reepham,

- Firstly, resulting from the premature publication of the Draft Site Allocations DPD which identified two large shortlisted sites for 450 dwellings,
- Secondly, the removal/downgrading of the Aylsham justification, has not resulted in any change to the proposed allocations, and,
- Thirdly, from the significant range between 100-200 dwellings where the high number is double that of the low number.

For a medium sized town like Reepham (approx 2500 pop) an additional 200 dwellings will result in a significant population increase in the town in a short period, a significant visual impact on the open countryside surrounding the town, and also impact significantly on existing services as confirmed in the JCS para 6.55. by stating 'its schools are at capacity, bus services are limited and the STW also restricts development potential.

It would therefore be more Effective and Justifiable to amend the housing allocation for Reepham to 'approximately 100 dwellings'.

Hugh Ivins 11 October 2010

8500/10C.

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 10 C

Further Representations
Policy 15

The listing of Horsham St Faith and Newton St Faith as a Service Village and the inclusion within the Norwich Policy Area is appropriate due to the village's proximity to the city of Norwich and the City Airport.

However, Horsham St Faith and Newton St Faith are two distinctly separate settlements, with Horsham having the applicable services outlined in the JCS para 6.57 (primary school/food shop/bus service/village hall).

In this case it would be more Sustainable to direct any proposed housing allocations to Horsham rather than Newton as is suggested by Broadland DC's Site Allocations DPD (September 2009) – withdrawn in June 2006 due to the change in Govt, which identifies two large sites for 185 dwellings in Newton St Faith. (Attached – Doc 3)

It will be more Justifiable and Effective in JCS policy terms if Newton St Faith was excluded from the list of Service Villages.

Hugh Ivins 11 October 2010

Horsham St. Faith & Newton St. Faith

Settlement Overview

5.21 **Horsham St Faith & Newton St Faith*** is located within the Norwich Policy Area and is identified as **Service Village** in the Joint Core Strategy (Policy 15) where land will be allocated for small-scale housing development subject to form and character considerations. To the south of th Parish the Joint Core Strategy identifies the need for a Business Park related to the Airport (Policy 9)

Shortlisted sites

5.22 Settlements identified in this policy that are also within the Norwich Policy Area (marked *) may be considered for additional development, if necessary, to help deliver the 'smaller sites in the NPA' allowance (see Policy 9).

Reasons for shortlisting

5.23 The sites have been shortlisted because:

- They have the potential for good vehicle access
- They are near to local services
- They would have less of an impact on the environment and settlement form than other options,
- There is the opportunity to provide Play Space within some of the housing developments

5.24 In the case of Horsham & Newton St Faith 4, this provides an opportunity to maximise the use of new and existing transport infrastructure to benefit employment.

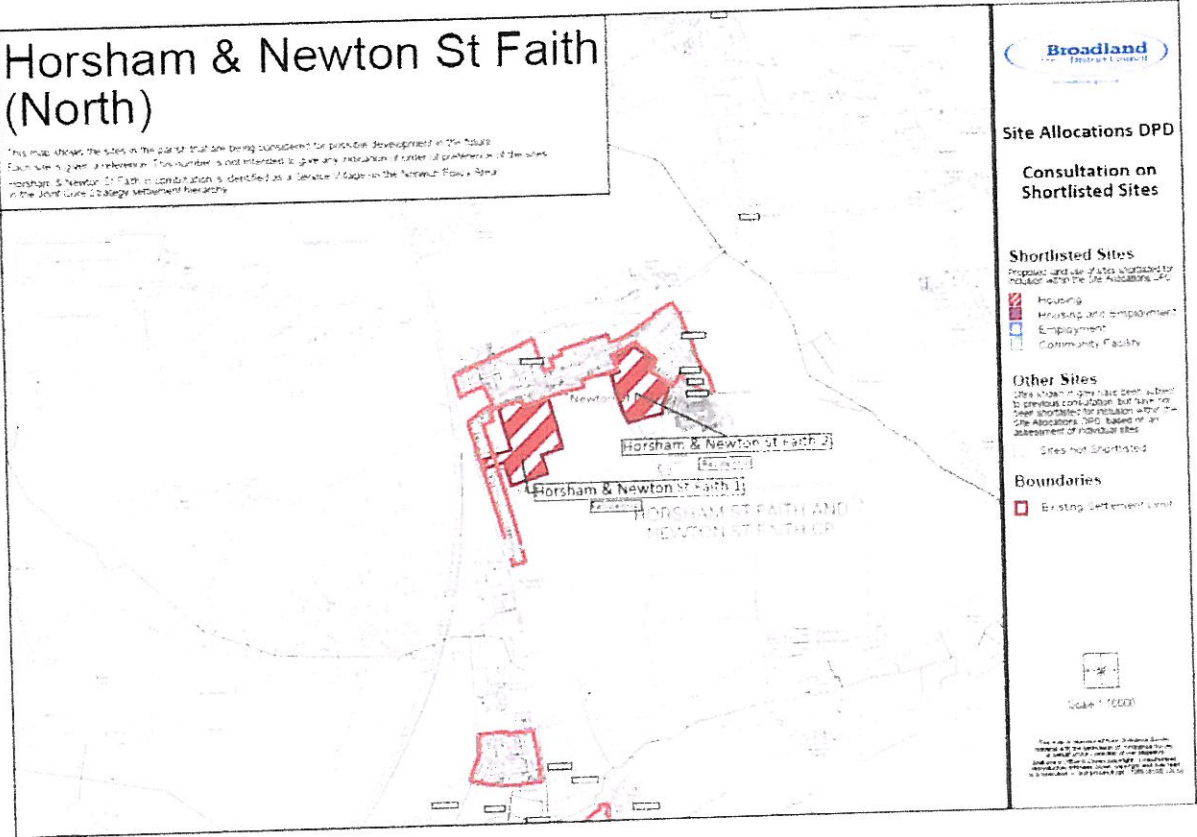
5.25 The map below provides an overview of those sites at Horsham St Faith and Newton St Faith that the Council has shortlisted as being potentially suitable for future development. It also shows those sites that were considered but not shortlisted.

5.26 More detailed site concept statements, relating to each of the shortlisted sites, follow below. The Council welcomes your views on these concept statements.

Horsham & Newton St Faith North

Horsham & Newton St Faith
 (North)

This map shows the sites in the parish that are being considered for possible development in the future. Each site is given a reference. This number is not intended to give any indication of order of preference or of the sites. Horsham & Newton St Faith's contribution is identified as a Service Village in the Norwich Policy Area in the Joint Core Strategy settlement hierarchy.



Site Allocations DPD
 Consultation on Shortlisted Sites

- Shortlisted Sites
 Proposed sites that are shortlisted for inclusion within the Site Allocations DPD
- Housing
 - Housing and employment
 - Employment
 - Community Facility

Other Sites
 Sites which have been subject to previous consultation but have not been shortlisted for inclusion within the Site Allocations DPD based on an assessment of individual sites

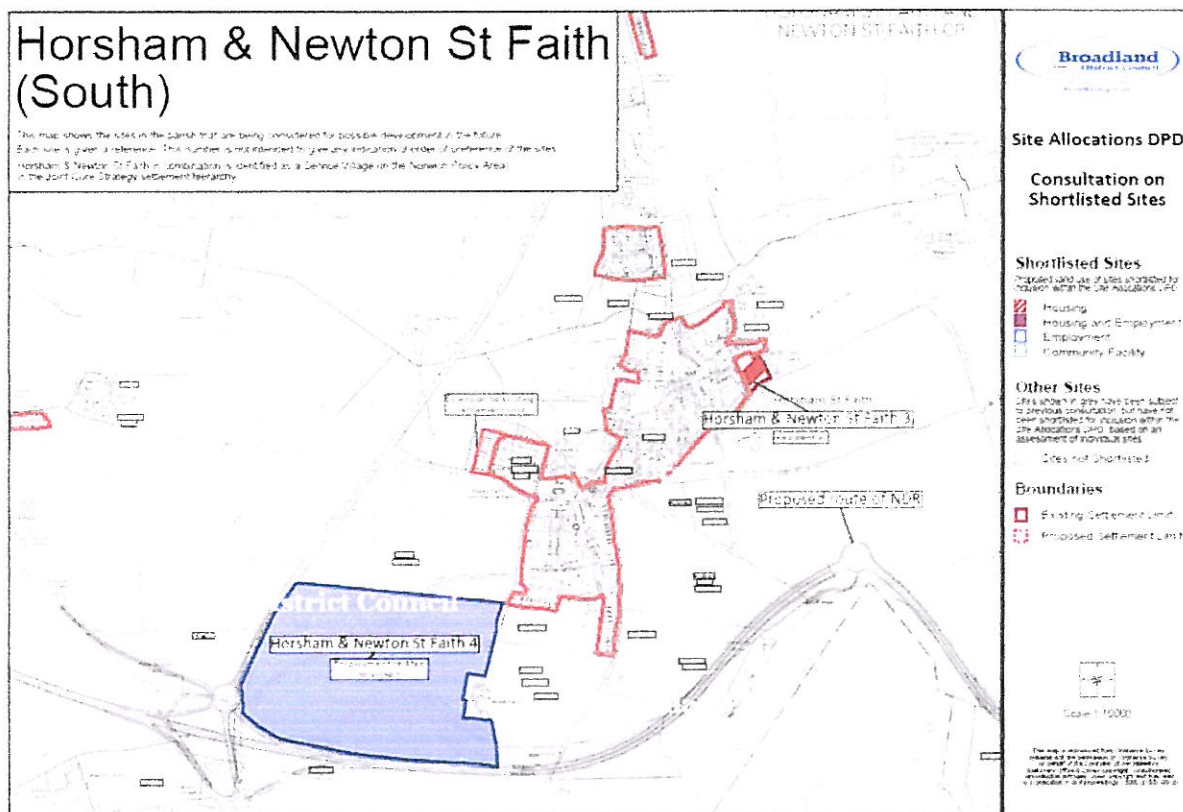
- Sites not shortlisted

Boundaries
 Existing Settlement Limit

Scale 1:10000

This map is a reproduction of a map made available to the public under the provisions of the Freedom of Information Act 2000. It is not intended to be used for navigation or other purposes. The map is provided as a guide only and does not constitute a contract. The map is subject to change without notice. The map is provided as a guide only and does not constitute a contract. The map is provided as a guide only and does not constitute a contract.

Horsham & Newton St Faith South



Introduction to Concept Statements

5.27 In addition to identifying sites for development, the Council also intends to produce brief 'concept statements' setting out how a proposed development may be carried out. These may be taken forward as supporting or 'supplementary' documents to provide more detailed guidance on the selected development sites. The main element of the statements is a simple plan that illustrates a possible layout for the site, with the intention being to add explanatory text to give more detail.

5.28 We have produced initial Concept Statements for each of the shortlisted sites in this settlement, and these follow below. We would value your comments on these statements. In particular, we are interested in your views on the following:

- **Site Assets:** Are there any important features or attributes to the site, or nearby, that should be taken into consideration in planning for development on the site?
- **Concept:** The concept plan gives a possible basic idea of how the site might be developed. Is this appropriate or is there a better way of doing it? (nb. In addition to the matters addressed in the concept plan, a development proposal

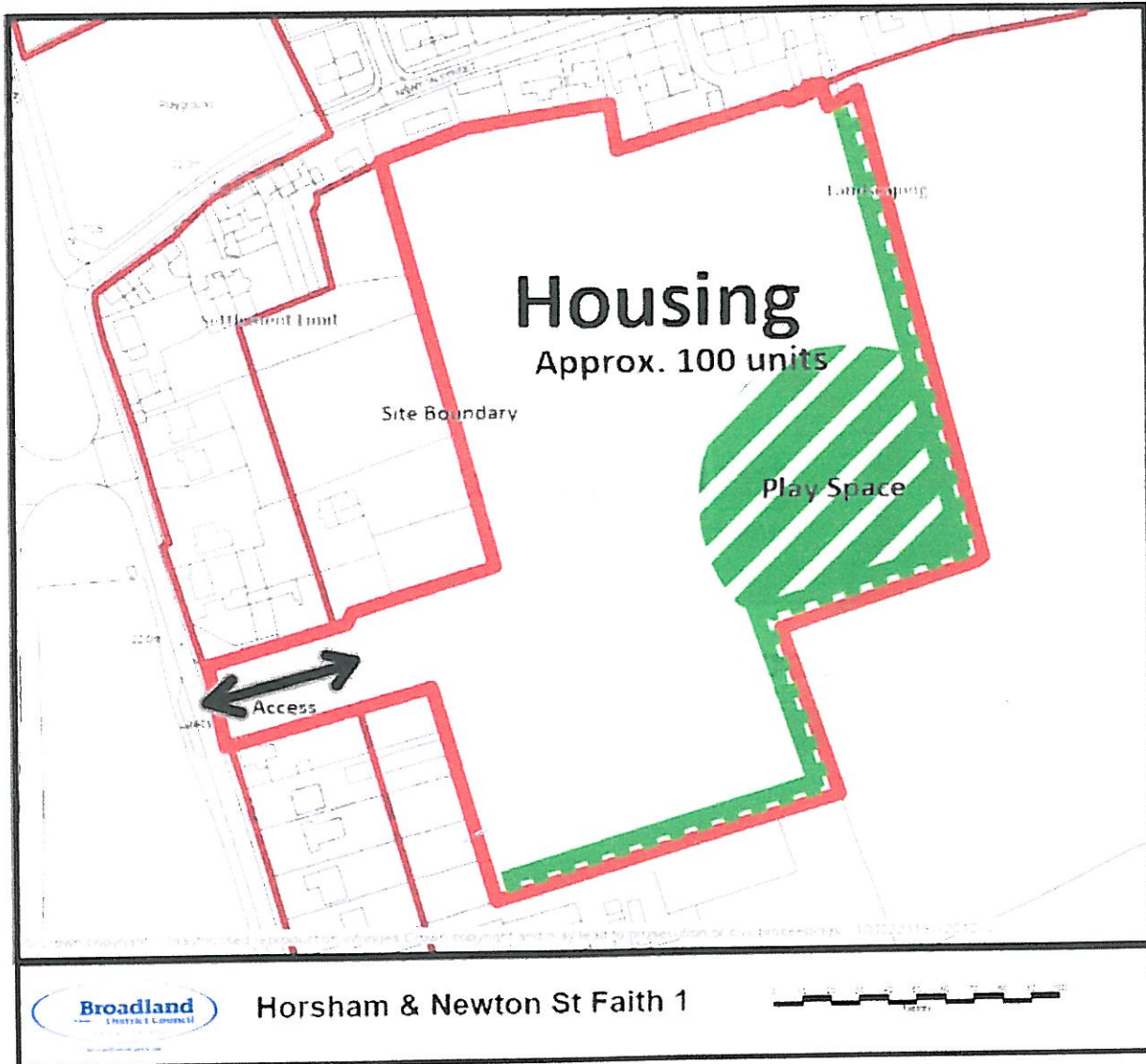
Norwich Policy Area - Service Villages

will need to address other issues such as design, type of property, provision of physical and social infrastructure, energy efficiency and water management, nature conservation, and ,for residential development proposals, the provision of affordable housing. This is in accordance with the policies contained in the Joint Core Strategy and elsewhere).

- **Other considerations:** Other specific considerations may apply to individual sites. For example, on brownfield sites there may be a need to address possible contamination before a development proceeds. Also, the disposal of waste-water is a particular difficulty in some areas and may require non-standard solutions for development to progress.
- **Viability and timescale:** Sites will only be identified for development where it is believed that they are viable and achievable within a reasonable timescale. Site owners or promoters of development will be expected to demonstrate that this is the case.

Horsham St. Faith & Newton St. Faith 1

Horsham & Newton St Faith 1



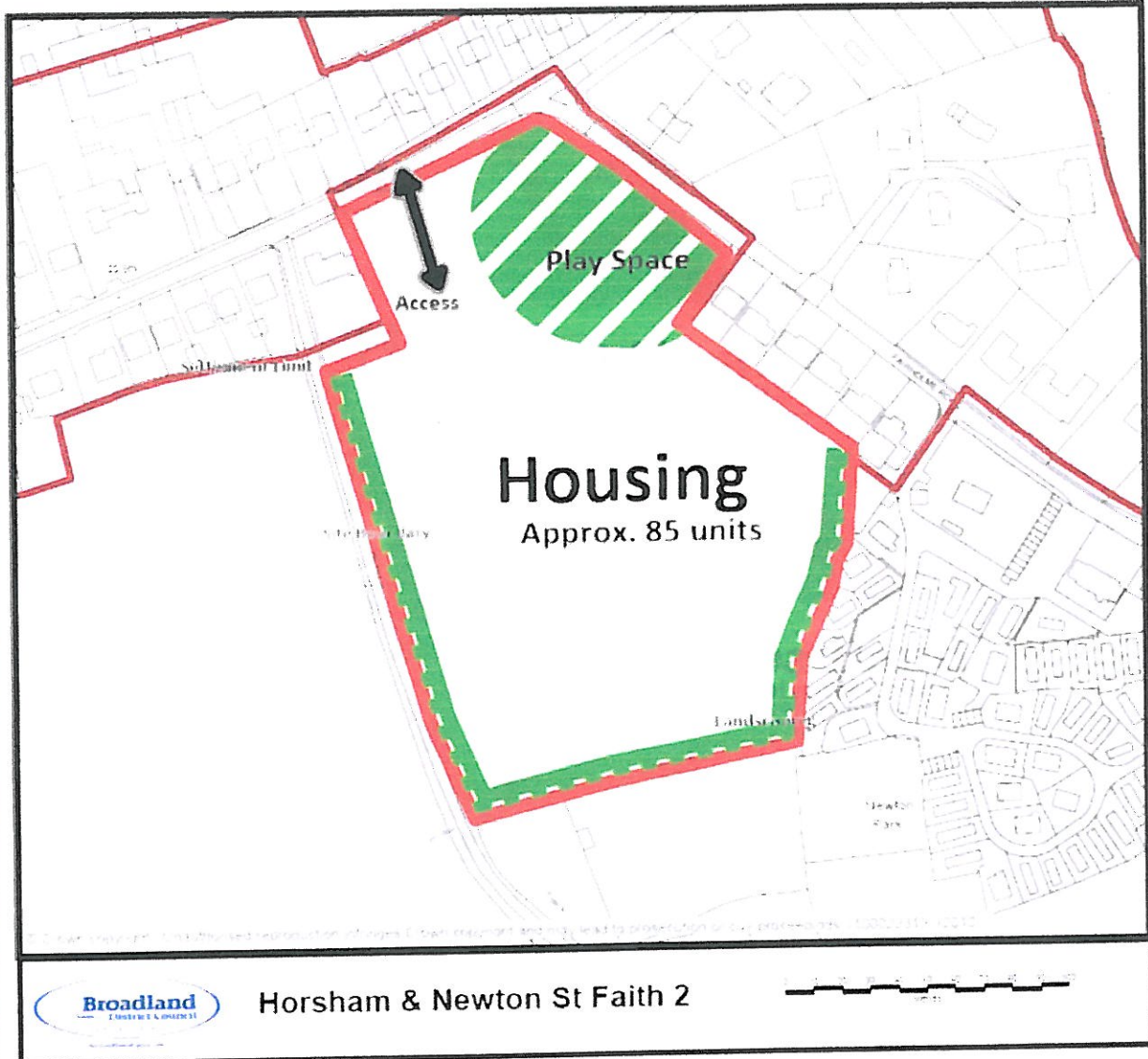
Site Horsham St. Faith & Newton St. Faith 1

East of Manor Road (inc. Site of 'Crown Garage')

Site Area	4.32 Ha
Existing Use	Garage forecourt and unused agricultural or amenity land
Proposed Use	Approx 100 dwellings

Horsham St. Faith & Newton St. Faith 2

Horsham & Newton St Faith 2



Site Horsham St. Faith & Newton St. Faith 2

Newton Street/Fairholme Road

Site Area	3.08 Ha
Existing Use	Amenity land
Proposed Use	Approx 85 dwellings

Horsham St. Faith & Newton St. Faith 3

Horsham & Newton St Faith 3



Site Horsham St. Faith & Newton St. Faith 3

Coltishall Lane

Site Area	0.83 Ha
Existing Use	Paddock
Proposed Use	Approx 25 dwellings

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 5800
Re Matter 10 D

Further Representations
Policy 15

There is some uncertainty regarding the scale of the proposed allocations for Horsham St Faith, in two respects;

i) Firstly, the JCS outlines in para 6.58 that allocations in Service Villages will provide 'small-scale' housing growth to meet a range of local needs including affordable housing. While stating that 'for villages outside the NPA allocations will be within the range of 10-20 dw', no such housing commitment is made in respect of those Service Villages within the NPA., other than to state that they may be also be considered for additional allocations, but 'having regard' to sites which can be made available in higher order settlements. (Note this is not applicable to Policy 16 Other Villages within the NPA).

ii) Secondly, it is also unclear how the additional allocation of 2000 dwellings (JCS Policy 9) will be allocated amongst the NPA settlements within the Broadland DC's area. Draft Policy 15 simply states land will be allocated for small-scale housing development subject to form and character considerations. There is however no definition of what constitutes 'small scale housing' in the JCS.

To be Effective and Soundly based the policy should;-

i) confirm that the 10-20 dwellings allocation also applies to the NPA Service Villages.

ii) Define what constitutes 'small scale housing' under the JCS.

Hugh Ivins 11 October 2010.

Examination into the JCS of the GNDP

Hugh Ivins BA MRTPI
Representor Ref 8500
Re Matter 10 F

Further Representations
Policies 9 and 14-16

In respect of Broadland, under draft Policy 9 the 'mechanism' for delivering the 2000 dwellings on 'smaller sites' in the NPA, will be made 'in accordance with the settlement hierarchy and local environmental and servicing considerations'.

Firstly, there appears to be no definition as to what constitutes 'smaller sites'.

Secondly, in respect of Policy 15 it is not clear if the land allocation criteria, - 'small scale housing development subject to form and character considerations' - is also applicable to 'additional allocations' under Policy 9.

Thirdly, in the Broadland NPA. the 2000 additional dwellings are to be allocated between 2 Key Service Centres (Blofield, Brundall) under Policy 14, and between 6 Service Villages (Blofield Heath, Great Plumstead & Little Plumstead, Horsford, Horsham St Faith & Newton St Faith, Salhouse, Spixworth), under Policy 15. There are no 'Other Villages' in the Broadland NPA under Policy 16. (Attached - Doc 4).

This begs the question as to how this significant housing requirement of 2000 additional dwellings is going to be shared amongst these settlements, which averages at 250 dwellings per settlement, as current draft proposals in the two Key Service Centres is only for 'approximately 50 dwellings' each, and in the five Service Villages allocations are only for 'small scale' housing.

This surely cannot be done without a significant impact on 'local environmental and servicing considerations' required by Policy 9 or the 'impact on form and character considerations' as required by Policy 14 & Policy 15.

To be Effective in its implementation this significant additional allocation in the Broadland NPA must be planned into the existing proposed allocations of the 2 Key Service Centres and 6 Service Villages to remove any uncertainty concerning deliverability of this allocation.

Hugh Ivins BA MRTPI 11 October 2010

Policy 9: Strategy for growth in the Norwich Policy Area

The Norwich Policy Area (NPA) is the focus for major growth and development.

Housing need will be addressed by the identification of new allocations to deliver a minimum of 21,000 dwellings distributed across the following locations:

- Norwich City Council: 3,000 dwellings
- Broadland smaller sites in the NPA: 2,000 dwellings
- South Norfolk smaller sites in the NPA and possible additions to named growth locations: 1,800 dwellings
- Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle: 7,000 dwellings by 2026 continuing to grow to around 10,000 dwellings eventually
- Easton/Costessey: 1,000 dwellings
- Cringleford: 1,200 dwellings
- Hethersett: 1,000 dwellings
- Long Stratton: 1,800 dwellings
- Wymondham: 2,200 dwellings

All the numbers above are the minimum number of dwellings to be delivered in each location.

Allocations to deliver the smaller sites in Broadland and South Norfolk will be made in accordance with the settlement hierarchy and local environmental and servicing considerations.

Transport infrastructure required to implement NATS, deliver growth and support the local economy will include:

- construction of the NDR to provide strategic access, significantly improve quality of life and environmental conditions in the northern suburbs and nearby villages, and provide capacity for comprehensive improvements for

buses, cycling and walking as well as facilitating economic development

- significant improvement to the bus, cycling and walking network, including Bus Rapid Transit on key routes in the Norwich area linking major growth locations, strategic employment areas and the city centre
- enhancing the Norwich Park & Ride system
- new rail halts at Broadland Business Park and Rackheath (innovative new services will be investigated on the Wymondham – Norwich – Wroxham axis)
- junction improvements on the A47 Norwich Southern Bypass
- a Long Stratton Bypass
- parking restraint in areas with good standards of public transport accessibility especially in and around the city centre

Opportunities will be sought to enhance green infrastructure throughout the area, with particular emphasis on priority areas.

Employment development at strategic locations will include:

- significant expansion of office, retail and leisure provision in the City Centre. Land will be identified to deliver a net increase at least 100,000m² of new office floorspace
- significant expansion of health, higher education and, in particular, science park activity at the University of East Anglia/Norwich Research Park. A first phase of around 55ha will provide for uses limited to those appropriate for a science park (principally use class B1(b)) with further phases dependent on the achievement of this vision
- a new business park of around 30ha associated with the Airport and focussed on uses benefiting from an airport location

Policy 14: Key Service Centres

Land will be allocated for residential development broadly of the scale indicated below (and subject to detailed assessment including impact on form and character and the resolution of any specific servicing constraints). Established retail and service areas will be protected and enhanced where appropriate, and local employment opportunities will be promoted. Future development plan documents will consider the adequacy of employment land provision.

Acle: 100 to 200 dwellings

Blofield*: approximately 50 dwellings

Brundall*: approximately 50 dwellings

Hethersett*: at least 1,000 dwellings

Hingham: approximately 100 dwellings

Loddon/Chedgrave: 100 to 200 dwellings

Long Stratton*: at least 1,800 dwellings

Poringland/Framingham Earl*: 100 to 200 dwellings

Reepham: 100 to 200 dwellings

Wroxham: 100 to 200 dwellings

*Settlements identified in this policy that are also within the Norwich Policy Area (marked *) may be considered for additional development, if necessary, to help deliver the 'smaller sites in the NPA' allowance (see Policy 9).*

Contributes to spatial planning objectives 1, 2, 3, 6, 7, 8 and 9

6.43 Ten settlements, defined as Key Service Centres (KSCs), have a range of facilities enabling them to meet local needs as well as the needs of residents of surrounding areas. Typically these are a primary school, a secondary school either within the settlement or easily accessible by public transport, a range of shops and services (including convenience shopping, but more limited in scope than those in the Main Towns), a village hall, primary health care, and a library. They also have public transport services for non-journey to work and leisure purposes. The KSCs with more limited services and no local secondary school have housing allocations towards the lower end of the range.

6.44 Acle, Blofield, Brundall, Loddon/Chedgrave, and Wroxham are close to the Broads and development must ensure there is no detrimental impact, including no significant detrimental effect on the Broadland SPA, Broads Ramsar and Broads SAC.

6.45 Key Service Centres in the NPA may also be considered for additional allocations

if it should prove necessary to meet the total housing provision target, having regard to sites which can be made available in higher order settlements as set out in the settlement hierarchy.

6.46 Acle has a secondary school, and a small range of shops and services serving everyday needs. It has good bus and rail links, is an access point to the Broads and can provide for limited job growth. Infrastructure and environmental constraints, including high quality agricultural land, flood risk, impact on the Broads and sewage disposal, limit its potential to accommodate new housing development. Improvements to sewage treatment works may require phasing. An allocation of between 100-200 dwellings is proposed.

6.47 Blofield is a large village with a reasonable range of facilities, but limited shopping and employment. It is surrounded by high quality agricultural land. Secondary education is provided at Thorpe St Andrew. There are more sustainable options for accommodating new housing developments in the Norwich Policy Area;

Policy 15: Service Villages

In each Service Village land will be allocated for small-scale housing development subject to form and character considerations. Small-scale employment or service development appropriate to the scale and needs of the village and its immediate surroundings will be encouraged. Existing local shops and services will be protected.

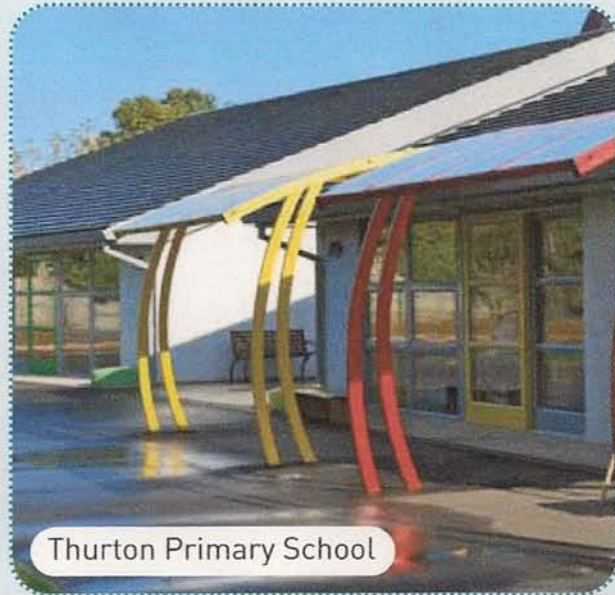
The Service Villages are: Alburgh, Ashwellthorpe, Aslacton and Great Moulton, Barford, Barnham Broom, Bergh Apton, **Blofield Heath***, Bramerton*, Brooke, Broome, Bunwell, Buxton, Cawston, Carleton Rode, Coltishall and Horstead, Dickleburgh, Ditchingham, Earsham, Foulsham, Freethorpe, Geldeston, Gillingham, **Great Plumstead and Little Plumstead***, Hales (including part in Heckingham Parish), Hempnall, **Horsford***, **Horsham St Faith and Newton St Faith***, Kirby Cane (including part in Ellingham Parish), Lenwade, Lingwood, Little Melton*, Mulbarton and Bracon Ash*, Newton Flotman*, Norton Subcourse, Pulham Market, Pulham St Mary, Reedham, Rockland St Mary, Roydon, **Salhouse***, Saxlingham Nethergate, Scole, Seething, South Walsham, **Spixworth***, Spooner Row*, Stoke Holy Cross*, Surlingham*, Swardeston*, Tacolneston and Forncett End, Tasburgh*, Thurlton, Thurton (including part in Ashby St Mary Parish), Wicklewood,

Woodton (including part in Bedingham Parish), Wortwell, Wreningham, Yelverton (including part in Alington Parish).

In addition to the settlements above, Easton and Rackheath have equivalent status to a Service Village while providing a location for significant housing growth.

Settlements identified in this policy that are also within the Norwich Policy Area (marked *) may be considered for additional development, if necessary, to help deliver the 'smaller sites in the NPA' allowance (see Policy 9).

Contributes to spatial planning objectives 2, 3, 6, 7, 8 and 9



Policy 16: Other Villages

The Other Villages identified below will have defined development boundaries to accommodate infill or small groups of dwellings and small-scale business or services, subject to form and character considerations.

Aldeby, Bawburgh*, Bressingham, Brockdish, Burgh St Peter (including part within Wheatacre parish and the adjacent developed area in Aldeby parish), Burston, Caistor St Edmund*, Cantley, Claxton, Colton*, Denton, Flordon*, Forncett St Peter, Forncett St Mary, Frettenham, Great Melton*, Haddiscoe, Hainford, Hardwick,

Hedenham, Hevingham, Keswick*, Ketteringham*, Langley Street, Marlingford*, Marsham, Morley, Needham, Shelfanger, Shotesham, Starston, Strumpshaw, Swainsthorpe*, Tibenham, Tivetshall St Margaret, Tivetshall St Mary, Toft Monks, Topcroft Street, Winfarthing.

*Settlements identified in this policy that are also within the Norwich Policy Area (marked *) may be considered for additional development, if necessary, to help deliver the 'smaller sites in the NPA' allowance (see Policy 9).*

Contributes to spatial planning objectives 2, 3, 6, 7, 8, and 9

- 6.60 The area contains a large number of villages that have few or no local services, and would not provide a sustainable location for significant new development. Such places are very reliant on the services of larger centres for their everyday needs, and new development would not necessarily help to retain or attract services due to the ever increasing population thresholds required to support them. While significant expansion would be unsustainable, and no allocations are proposed, some of those places with basic essential services would be capable of accommodating very limited windfall infill development without affecting the form and character of the villages. Housing to provide for local needs may also be suitable.
- 6.61 The Other Villages have been defined based on having a basic level of services/facilities. This is generally a primary school and village hall, though regard will be had to the presence of a range of other services. These will normally be available within the identified settlement, though regard will also be had to their availability in other nearby settlements where there is good access particularly by foot or cycle.
- 6.62 In exceptional circumstances, a larger scale of development may be permitted where it would bring local facilities up to the level of those in a Service Village, and is acceptable having regard to other policies in this Joint Core Strategy, or a relevant subordinate Development Plan Document.

References:

06 Policies for places, Policy 16

- Planning Policy Statement 7 (PPS7) Sustainable Development in rural areas