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Hearing Statement: Matter 10

Timewell Properties Ltd [8209]

Agent ref: [390]

Hearing Statement

Greater Norwich Joint Core Strategy
Development Plan Document
Matter 10

BIDWELLS



Quality Assurance

Site name: Land at Little Melton, South Norfolk (77-06)

Client name: Timewell Properties Ltd

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Bidwells on behalf of Timewell Properties Ltd. It relates to representations submitted by Bidwells, on behalf of Timewell Properties Ltd to the pre-submission version of the Greater Norwich Joint Core Strategy (JCS) in respect of **Policy 15 (Service Villages) and its reasoned justification (para. 6.58-9)** (Respondent ID: 8209).
- 1.2 The Statement has been sub-divided under the questions posed by the Inspectors in their Matters & Key Questions for Examination at the Hearings document (20/08/10).

2 MATTER 10 KEY SERVICE CENTRES, SERVICE VILLAGES, AND SMALLER COMMUNITIES (POLICY 14-16)

C Does the JCS provide sound core strategic guidance for the future planning of these settlements? Does the evidence demonstrate that the service villages are appropriately listed as such with no additions/deletions?

D Is the scale of development for the individual villages soundly based?

Does the JCS make clear what mechanism(s) will be used for resolving whether or not 'additional development' is necessary at any of the key service centre, service villages or other villages in order to 'deliver' the "smaller sites in the NPA" allowance? To be effective on this point, should the JCS be clear/more specific about this? What would it need to say?

- 2.1 Timewell Properties Ltd considers that Little Melton is appropriately listed in the JCS as a Service Village. It has a good range of services and facilities helping to provide for the day to day needs of the local community.
- 2.2 Timewell Properties Ltd considers that Little Melton's role and function as a Service Village and its location within the Norwich Policy Area (NPA) makes it a suitable location for sustainable development.
- 2.3 However, Timewell Properties Ltd suggests that JCS Policy 15 does not currently provide an adequate framework for the future planning of Service Villages, including the preparation of the District Council's Site Specific Allocations DPDs. This is because the JCS has set a generic and arbitrary number of homes to be provided in Service Villages (10 to 20 dwellings), across the entire GNDP area. This figure is suggested irrespective of a village's local circumstances, including whether a village requires and can accommodate more growth to meet local housing needs and to support local services and facilities etc.
- 2.4 As well as setting an arbitrary number of homes to be delivered (10 to 20 homes) at Service Villages across the GNDP area, the policy also includes a vague suggestion that growth

- beyond 20 dwellings may or may not be acceptable in Service Villages, dependant upon what happens elsewhere.
- 2.5 However, the JCS fails to provide any guidance on how the additional growth beyond 20 dwellings will be decided, including how the "smaller sites in the NPA allowance" will be distributed amongst settlements in the NPA. There appears to be little rationale why the JCS has not sought to be more specific about the "smaller sites in the NPA allowance".
- 2.6 It is Timewell Properties Ltd opinion that what the JCS should have done is to individually specify the level of growth to be provided at each of the identified Service Villages, based on an assessment of the capacity of each of the Service Villages to accommodate sustainable growth, taking into account environmental and infrastructure capacity, local housing needs, and the availability of suitable development sites etc.
- 2.7 This way the JCS could have been more specific about the level of growth to be accommodated at each of the Service Villages and therefore be more specific about how the "smaller sites in the NPA allowance" would be distributed. This would have provided a robust framework for the preparation of site allocation DPDs, based on local needs and the ability of settlements to accommodate sustainable growth.
- 2.8 Failing this approach, the JCS should have at the very least provided the criteria for determining which NPA settlements are suitable locations to accommodate more than 10-20 dwellings, i.e. a proportion of the "smaller sites in the NPA allowance", and the criteria to determine the level of growth to be accommodated at each suitable settlement.
- 2.9 The implications of the JCS's current approach is that for Service Villages such as Little Melton, the level of growth currently attributed to the village by the JCS (10-20 dwellings over a 15 year period) is too low.
- 2.10 This equates to around 1 house per year over the plan period. It is an arbitrary figure and does not reflect the acknowledged need for homes in the Little Melton area, as demonstrated in the Strategic Housing Market Assessment. It also fails to take account of the village's location close to Norwich; the village existing services and facilities, its proximity to jobs and other services and facilities; and the availability of suitable development land as demonstrated in the Strategic Housing Land Availability Appraisal (SHLAA). Most importantly it does not reflect a proper assessment of Little Melton's ability to accommodate sustainable growth to meet its local housing needs.
- 2.11 Timewell Properties Ltd suggest that Little Melton (as a Service Village in the NPA) is capable of accommodating 'non strategic' growth of more than 10-20 dwellings, within existing

environmental and infrastructure capacity limits to meet local housing needs. The JCS should have acknowledged this, rather than vaguely suggest it may get additional growth, but it may not, dependant upon what happens elsewhere. This is a less than robust approach to determining the future growth of villages

Conclusion

- 2.12 The JCS fails to properly reflect the ability of each of the individual Service Villages to accommodate sustainable growth and thus it fails to attribute housing numbers appropriately. The JCS has set a arbitrary housing figure for all Service Villages (10 to 20 dwellings), irrespective of individual village circumstances, local need with a vague suggestion that certain villages may or may not be allocated a higher figure, subject to what might or might not happen elsewhere. This is unsound.
- 2.13 It is Timewell Properties Ltd opinion that the JCS should have defined a more robust and credible distribution of growth to Service Villages, based on individual local circumstances, local housing needs and the capacity of villages to accommodate sustainable growth.

Suggested change

- 2.14 The JCS should be amended to distribute appropriate levels of housing growth to Service Villages based on their ability to accommodate sustainable growth. This should be informed by an assessment of local housing need, location, access to services, jobs and facilities, environmental and infrastructure capacity, ability to increase capacity and availability of suitable development land. For Little Melton, this figure is clearly higher than the 10-20 dwellings suggested in the Policy.
- 2.15 Failing this, Timewell Properties Ltd suggest that the JCS should be amended at paragraph 6.58-6.59 to confirm that:

"....the specified levels of growth to be provided at Service Villages, particularly those in the NPA (10-20 dwellings), will be considered to be a minimum figure to allocate, with additional growth beyond 20 dwellings to be determined on the basis of :

- ***meeting the housing needs of local people***
- ***improving and supporting existing local services and facilities..***
- ***the ability of the settlement to accommodate more growth within sustainability limits;***

The Site Specific Allocations DPD process will be informed by an assessment of the ability of each Service Village to accommodate sustainable growth to meet local needs."

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