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Hearing Statement: Matter 3

Paul Dunthorne [8216]

Agent ref: [390]

Hearing Statement

Greater Norwich Joint Core Strategy
Development Plan Document
Matter 3

BIDWELLS



Quality Assurance

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Client name: Paul Dunthorne

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Bidwells on behalf of Mr Paul Dunthorne. It relates to representations submitted by Bidwells, on behalf of Mr Paul Dunthorne, to the pre-submission version of the Greater Norwich Joint Core Strategy (JCS) and the Statement of Focused Changes in respect of **Policy 10: Locations for major new or expanded communities in the Norwich Policy Area (NPA)** and **Policy 15: Service Villages** (Respondent ID: 8216).
- 1.2 This Hearing Statement is intended to amplify the representations made by Bidwells at the pre-submission stage of the Joint Core Strategy's production and update those comments in light of the suggested Focused Changes. Since the issues raised in the representations are relevant to both Matters 3 and 10, this statement (for Matter 3) and the accompanying statement (for Matter 10) should be read in conjunction.
- 1.3 This hearing statement is written in light of the GNDP's decision not to proceed with the Focused Changes relating to the Growth Triangle and revert to the previous version of the JCS policy for the Growth Triangle. Many of the issues raised in the statement are relevant to both the previous version of the JCS Policy 10, and the version included in the Focused Changes.

2 MATTER 3 (PART B): STRATEGY AND LOCATIONS FOR MAJOR GROWTH IN THE NPA (PART B – OLD CATTON/SPROWSTON/RACKHEATH/THORPE ST ANDREW GROWTH TRIANGLE (PART POLICY 10 AND APPENDIX 5))

In principle, do policy 10 and appendix 5 (as amended by Focussed Changes 8-10) provide a sound procedural basis for the strategic allocation of the growth triangle and an appropriate level of guidance for taking its development forward in a coordinated way without an AAP through future detailed master planning of the various quarters

- 2.1 JCS Policy 10 fails to provide a sound procedural basis for the allocation of development in the growth triangle and does not provide an appropriate level of guidance for taking development forward.

Procedural Failures

- 2.2 JCS Policy 10 was proposed to be significantly changed by Focused Changes 8-10. If accepted, the result would have been that detailed site specific policy and land allocation for the Growth Triangle would be developed, brought forward and approved by the Council through the preparation of a Supplementary Planning Document (SPD), rather than an Area Action Plan (AAP).

- 2.3 The result of the JCS Focused Changes would have been to allocate only the land included within the Eco-Community proposals for development at Rackheath (see diagram page 28 of Focused Changes document). It is considered unlikely that the JCS examination will consider other individual site promotions at Rackheath, therefore, the ability for landowners with sites outside of the Eco-Community boundary to have the case for allocation of their land to be considered and tested independently by an Inspector would be fettered by the suggested approach to prepare an SPD rather than a AAP.
- 2.4 The GNDP's decision not to proceed with the Focused Changes and to proceed on the basis of preparing a AAP, at least enables individuals promoting alternative development sites in Rackheath, outside of the current Eco-community promoted site boundaries to have their concerns and cases considered and examined by an Independent Inspector
- 2.5 However, there are still significant concerns that the original version of JCS Policy 10 still fails to provide adequate guidance to those individuals proposing small sites in the Rackheath area outside of the Eco-community/low carbon development.
- 2.6 There is a concern that the GNDP/Broadland Council have already made their mind up that potential development sites in Rackheath will only be those that form part of a legal contract/consortium agreement with the Eco-Community site promoter. The GNDP/Council have not yet acknowledged the role that 'small sites' in Rackheath not part of the Eco-Community consortium could have in meeting local housing need. This is reflected by Broadland Council's proposed 'shortlisted sites' consultation, which excluded as a matter of principle small sites in the Rackheath area and lack of clear guidance in the JCS.
- 2.7 If this is the GNDPs/Broadland Council's approach to 'non-strategic' sites at Rackheath, it does not accord with Policy 15 Service Villages, which does suggest the possibility of small-scale non-strategic allocations in Service Villages (including Rackheath) to provide housing to meet a range of local needs.

Content Failures

- 2.8 The original JCS Policy 10 and the version amended by Focused Changes (FC 9 & related appendix FC10) fails to acknowledge the role small 'non strategic' sites in Rackheath (i.e. sites outside of the Eco-Community boundary) could have in meeting local housing needs. JCS Policy 10 provides no planning guidance for such sites to come forward independently of the Eco-Community, even where sufficient infrastructure capacity exists and development would not prejudice the delivery of the Eco-Community.

- 2.9 There is a concern that Broadland Council do not anticipate small sites outside of the Eco-community boundary at Rackheath to be considered suitable for development. The proposed Broadland site allocations DPD consultation excluded all promoted 'small sites' in the Rackheath part of growth triangle from the list of tested and preferred 'shortlisted sites'.
- 2.10 The result of the GNPD/Broadland Council stance could be that the only suitable development sites in Rackheath will be those that are included as part of the current Eco-Community boundary (shown on the diagram on page 28 of the Focused Changes). This is unfair and potentially unsound.
- 2.11 It fails to recognise that there are other smaller 'non-strategic' sites in Rackheath outside of the Eco-community boundary that would contribute to sustainable development. It also results in the JCS being internally inconsistent with Policy 15, which does suggest a role for smaller 'non-strategic' development sites at Rackheath (See Paul Dunthorne's Statement for Matter 10).
- 2.12 JCS Policy 10's failure to acknowledge the role of small 'non strategic' sites in Rackheath and Broadland Council's apparent stance on 'small sites' at Rackheath potentially fetters the ability of other landowners, not part of the Eco-Community to bring forward and seek the allocation of what could otherwise be acceptable land for development.
- 2.13 The result of the adoption of JCS Policy 10 and Broadland Council's apparent stance would be that 'small sites' in Rackheath outside of the Eco-community boundary would automatically be deemed unsuitable for development on the basis of them not being included within the Rackheath Eco-Community promotional agreement/arrangement, irrespective of them being tested for their sustainability and deliverability credentials.
- 2.14 The decision about which sites should be considered suitable for development in Rackheath ought to be based on their planning merits not whether they are included as part of an existing Eco-Community's landowner promotional agreement/arrangements.
- 2.15 Smaller 'non strategic' sites in Rackheath would have an important role in helping to ensure an ongoing supply of homes to meet existing housing demand in the area during the period before the Eco-Community delivers substantial numbers of new homes or in the event that the Eco Towns program is scaled back, delayed or revoked altogether and especially given the current lack of housing supply in the area.
- 2.16 Small 'non strategic' sites in Rackheath will help contribute to the allowance for development on 'smaller sites in the NPA (2000 homes in Broadland), as indicated by Policy 15.

Suggested Changes to Policy 10

2.17 Policy 10 needs to be further amended to:

1) Acknowledge the role smaller 'non-strategic' sites in Rackheath (i.e. outside of the Eco-community landowner/promoter agreements) will have in meeting the housing need of local people; and

2) Confirm that smaller 'non-strategic' sites in Rackheath will be allocated for development independent of the Eco-Community proposal (in line with JCS Policy 15).

2.18 Policy 10 (as proposed to be amended by the Focused Changes) should be reworded along the following lines:

"A single co-ordinated approach will be required to deliver strategic levels of growth across the whole area. More detailed masterplanning will be required for each quarter. Smaller 'non strategic' growth will be permitted at Rackheath where it can be demonstrated that development would not prejudice the delivery of the Eco Community and that it can be accommodated within existing or expanded infrastructure capacity limits. Such sites will help deliver the Broadland "small sites in the NPA" requirement (2000 homes)....."

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