

REPRESENTOR REFERENCE NUMBER: 8507  
MATTER NO: 10B, F & G

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MATTER NO: 10B

REPRESENTOR: MR R SMITH REPRESENTED BY BEACON PLANNING  
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**MATTER 10 KEY SERVICE CENTRES, SERVICE VILLAGES AND SMALLER RURAL COMUNITIES (POLICIES 14-16)**

**MATTER 10B Is the scale of development for the individual villages soundly based?**

**No logic or explanation for numbers**

- 1.0 There is no reasoning to explain the scale of development allocated to each settlement which varies from 50 to 200 or for those Key Service Centres identified for major growth, Long Stratton and Hethersett – 1,000 and 1,800 respectively.
- 1.1 The allocations do not appear to be based on a rational assessment of the suitability of the settlements for growth or ability to deliver development. The settlements proposed for 50 or more have the capacity to accommodate a larger scale of development. Equally those proposed for greater numbers appear on the basis of the evidence available to be less able to accommodate the suggested scale of development.
- 1.2 Policy 14 states that the hierarchy of allocations is dependant upon infrastructure constraints, and impact on form and character. Policy 9 states that 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.
- 1.3 The policy does not allocate the number of dwellings for each settlement in a consistent or sustainable manner. The allocations do not recognise the limitations on development at individual settlements and therefore the ability to deliver development both within and outside the NPA.
- 1.4 It is short-sighted to severely restrict development in settlements which can accommodate additional development of an appropriate scale without a detrimental impact on the environment or place undue strain on current infrastructure.
- 1.5 The Broadland District Council Site Specific Allocations Shortlist of Preferred Sites was made public on 25 May 2010. The Council agreed a public consultation programme and this was about to get underway in July. However this has been put on hold following announcements from central government on proposed reforms to the planning system, as well as proposed cuts in public sector funding. The public consultation exercise has not taken place to date.
- 1.6 Notwithstanding this it is interesting to note that the shortlist includes a number of sites, all of which the Council considered were sustainable, at Key Service Centres and Service Villages which exceed the figures proposed in the JCS.

**Inconsistency with background evidence**

- 2.0 Policy 14 fails to recognise the findings and conclusions of the GNDP Topic Paper: Settlement Hierarchy (November 2009) in proposing the scale of development for KCSs. This seriously undermines the robustness of the policy. For example:

- 2.1 At para 6.46 the JCS submission document highlights the considerable infrastructure and environmental constraints at Acle including high quality agricultural land, flood risk, impact on the Broads and sewage disposal which limit its potential to accommodate new housing development. Improvements to sewage treatment works would be needed. The advice set out in the GNDP Topic Paper: Settlement Hierarchy at section 5 is that new housing development at Acle should be low down the ranges proposed, i.e. 100 rather than 200. Nevertheless the policy proposes 100 to 200 dwellings at Acle.
- 2.2 Similarly at para 6.54 the description of Poringland makes no reference to existing surface water flooding issues. It does not highlight the evidence in the GNDP Topic Paper: Settlement Hierarchy that there are drainage and spring induced problems affecting some areas. Further this issue has been reiterated by Environment Agency in their representation to the JCS submission in January 2010.
- 2.3 At Lodden and Chedgrave the environmental constraints and areas at risk of flood will be significant factors at the site specifics stage. Improvements to sewage treatment works would require phasing. The GNDP Topic Paper: Settlement Hierarchy identifies a shortfall in capacity at the secondary school and recommends a figure of 150. Nevertheless the JCS submission proposes up to 200.
- 2.4 At para 6.44 Blofield is included within a list of settlements close to the Broads. The paragraph refers to protecting the Broadland SPA, Broads Ramsar and Broads SAC. It is appreciated that the Broads are an internationally important environmental area and major tourism facility. However, Blofield is not in close proximity to any such environmental designations. The nearest being on the south side of the settlement of Brundall, along the River Yare as shown on Natural England MAGIC interactive map.

**Amount of housing allocated to Key Service Centres should be expressed as a minimum**

- 3.0 The amount of land to be allocated is proposed in the JCS submission document at policy 14 as being 'broadly in the scale of' rather than as a minimum as in policy 9 and policy 13. However GNDP appear to have recently shifted their stance.
- 3.1 In the Draft Local Investment Plan and Programme 30 September 2010 at para 15.4 it states 'While the locations for the majority of this element of growth remain to be identified, the JCS does provide for indicative minimum (my underlining) scales of growth for selected NPA villages'. Notwithstanding the actual numbers this is to be welcomed as it means a more consistent general approach to the scale of development. The proposed figures would then be a starting point rather than a limitation to sustainable growth on the smaller sites.

**Recognition that there is scope in the NPA for additional development**

- 4.0 The Draft Local Investment Plan and Programme 30 September 2010 at para 15.3 also gives some advice. Although not explicitly specified, the implication is that this provision will be on sites smaller than 1,000 dwellings. Evidence from the SHLAA indicates that a wide range of scale of sites is likely to be available including some quite substantial sites providing

several hundred dwellings. This is borne out by more detailed work at district level e.g. Broadland District Council Site Specifics Allocations shortlist.

- 4.1 Blofield is a Key Service Centre proposed as suitable for 50 houses. The reason for 50 houses is stated as 'there are more sustainable options for accommodating new housing in the NPA but no explanation of what this means. A Key Service Centre within the NPA, free from the environmental and infrastructure constraints identified at other Key Service Centres, with good access to Norwich and local and strategic employment locations and on a major route, the A47, seems a logical location for a greater amount of development.

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**MATTER 10 KEY SERVICE CENTRES, SERVICE VILLAGES AND SMALLER RURAL COMUNITIES (POLICIES 14-16)**

**MATTER 10F:** 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 centres, 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 clearer/more specific about this? What would it need to say?

**Shortfall in housing supply sites already recognised**

- 1.0 Central government has confirmed a commitment to increasing housing supply and the requirements in PPS3 for local planning authorities to demonstrate they have a five year supply of sites remains.
- 1.1 The housing trajectory figures included in the draft GNDP Local Investment Plan and Programme suggests that the shortfall in meeting the average required house building rate to 2026 will not be met until around 2017/18. The draft LIPP states that 'This illustrates the need to be prepared for the development of the proposed growth areas as soon as possible'. Whilst this is clearly the case the ability to do so and the timing of delivery is uncertain.
- 1.2 GNDP has through its Focussed Changes and Topic Paper: Homes and Housing Evidence Paper August 2010 confirmed it is to proceed with the housing figures proposed before the abolition of the RSS. It recognises the challenge to provision and recognises it is already falling behind delivery targets.
- 1.3 Further the GNDP would already be aware that there was a recognised shortfall in housing sites from the Annual Monitoring Reports from the District Councils. For example Broadland District Council Annual Monitoring Report 2008-2009 (December 2009) at 5.15 states 'Broadland does not have a five year supply of ready to develop housing sites in the NPA'.
- 1.4 The JCS does not appear to tackle the shortfall which already exists and set out an effective plan for the next five years.

**Provision of infrastructure and major growth in question**

- 2.0 In the GNDP response to Inspectors' requirements arising from the Joint Core Strategy Exploratory Meeting held on 13 May 2010: Infrastructure highlights the extent of the essential infrastructure (categorised as Priority 1) fundamental to the strategy. There would appear to be growing uncertainty about funding sources for the provision of such infrastructure or commitment by utility providers to these projects. For example it is understood the GNDP has been advised by central government to cut back on work in relation to the NDR project. It is clear that at very least the implementation is to be severely delayed and or only partially implemented.

- 2.1 One point arises which should be questioned. The infrastructure strategy appears to apply a blanket approach to the need for infrastructure and ignores the ability to deliver housing and employment development at a smaller scale.
- 2.2 The table of Infrastructure Requirements for 2008 to 2016 states that the smaller sites, for 2,000 in the Broadland District part of NPA is dependent upon the transport infrastructure namely delivery of the Postwick Hub and NNDR. This is simply not the case. The sites will be spread across Broadland in Key Service Centres and Service Villages. Sites can be delivered in advance of or in the absence of this infrastructure without exceeding the capacity of the highway network, the utilities infrastructure or the community facilities.

### **Mechanism**

- 3.0 GNDP in the response to the Inspector question 24 dated 9 April 2010 has failed to address the issue of a lack of guidance for a co-ordinating mechanism to be applied to ensure the effective allocation of dwellings across the NPA but simply refers back to the policy and supporting text of the JCS submission. GNDP appear to take the view that as it represents only 15% of total new allocations their approach is that it is appropriate as it identifies 'broad locations for the majority of growth but gives flexibility to aid delivery and maximise choice'.
- 3.1 Proposing figures as an indication of the scale of development rather than as a minimum would appear to restrict flexibility. Further failure to recognise settlement constraints ignores the ability to deliver or timing.
- 3.2 Put bluntly there is no mechanism proposed to determine whether additional development is necessary, or when it will be appropriate.
- 3.3 Para 6.45 of the JCS submission states that additional allocations in Key Service Centres in the NPA' may be considered 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.'
- 3.4 There is however no explanation as to what would trigger consideration of additional allocations or the procedure by which these would be made. Are these to be allocations to settlements to be made by GNDP in a follow up document? Or are the subsequent allocations to be made through Site Specifics Allocation at district level? A procedure which enables proper consultation would take time and would require pre-planning and cannot reasonably be done on a site by site basis. In the interim planning applications would be inevitably submitted for windfall schemes to meet demand and will be left to District Councils to deal with on an ad hoc basis. Piecemeal development would take place, which the GNDP seeks to minimise.
- 3.5 Further no guidance is provided as to whether there would be a threshold e.g. the failure to meet house building targets, or what that would be.
- 3.6 Even if funding is secured for the necessary infrastructure, which is clearly open to question at this time, the major growth locations would not be on stream for at least 5 to 10 years.

- 3.7 This begs the question how is the GNDP to deliver sufficient housing within the next 5 years to meet housing supply requirements which already fall short. The smaller scale sites in and adjacent to Key Service Centres and Service Villages can make a valuable contribution to this. By their very nature these are sites which can be implemented quickly. The development of small scale sites would enable and sustain increased housing provision within the short term.



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**MATTER 10G: If the JCS is unsound in relation to any of the above matters, are there any specific changes that would render it sound? (It would be necessary to consider whether these required further consultation or sustainability appraisal)**

- 1.0 The capacity for development at the identified settlements should be reviewed with proper account taken of infrastructure and environmental constraints. The criteria by which the settlements have been assessed and the weighting these are given should be reviewed. The evidence from district councils, such as Broadland's background evidence prepared for their Site Specifics Shortlist should be acknowledged and used positively to inform the assessment process. This would mean further consultations are inevitable.
- 2.0 The proposed numbers set out in Policy 14 should be a minimum for each settlement.
- 3.0 Policy 14 should be worded positively to state that settlements within the NPA will be considered for additional development.
- 4.0 The mechanism for the consideration of additional allocations should be set out in within the JCS.
- 5.0 Statements for Matters 10B and 10F expand upon this.