

Statements on behalf of The Fairfield Partnership

**Matter 10 – Key service centres, Service Villages, and Smaller Rural Communities (policies 14-16)**

**Summary**

Our representations under Matter 10 are solely concerned with the mechanisms by which the JCS implements the ‘non-strategic/smaller sites’ allowance, and the issue of whether the JCS provides adequate clarity on this matter and would be effective. Our view is that greater clarity is needed, and greater consistency between Policy 9 and Policies 14, 15 and 16 on this matter.

We suggest minor amendments to the relevant policies and supporting text which we consider address our comments.

We believe that this element of the JCS housing allocation is essential to the flexibility of the overall spatial strategy, and provides a mechanism by which development can be distributed by subsequent DPDs so as to overcome potential problems with the phasing and delivery of critical infrastructure in the early part of the Plan period. We have referred to its importance in this respect particularly in our representations on Matter 3.

**Representations to Part F and G – The “additional development” element and the “smaller sites allowance”.**

**F 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?**

1. As noted in our representations to Matter 3C, it is relevant at the outset to consider what the practical implications are of the “non-strategic/smaller sites” allowance, when assessed in the context of Policies 14, 15 and 16.
2. Of the 2,000 units for Broadland to be found in the Norwich Policy Area (NPA), and the 1800 for South Norfolk in the NPA, Policy 14 provides that within Broadland, the two Key Service Centres (Blofield and Brundall) will together provide around 100 units, and in South Norfolk, the only Key Service Centre in the NPA that is not already a growth location is Poringland, which would take 100-200 dwellings. Policy 15 provides that 10-20 dwellings would be provided to each Service Village in the relevant parts of the NPA, which by our calculations would provide around 100-200 dwellings in South Norfolk, and around 60-120 dwellings in Broadland. Policy 16 for ‘other villages’ does not state a specific number of units per village, but given that there are fewer ‘other villages’ than there are ‘Service Villages’ altogether in the NPA, and logically each of these ‘other villages’ will be accommodating less than 10 units, this source of supply would be likely to add less than an additional 100 units.
3. So whilst we have no disagreement with limiting the scale of development in the villages, which seems wholly appropriate in the context of a sustainable

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strategy, the practical effects of the limitations imposed by Policies 14, 15 and 16 are that the vast majority of the so called 'smaller sites' allowance will not be met at the named villages at all, but elsewhere in the NPA.

4. We use the words 'so called' for the 'smaller sites' allowance, because under Policy 9 it will be appreciated that although the wording for the Broadland element refers to the 2,000 units being found on smaller sites, the wording for the 1,800 units in South Norfolk is different, and actually refers to both "smaller sites in the NPA and possible additions to named growth locations" (our underlining).
5. Taking South Norfolk as an example, our assessment above suggests that of the 1,800 units proposed, Policies 14, 15 and 16 would provide for less than a quarter of that total. It is, we would suggest, inconceivable and inappropriate that around 1,400 units could be accommodated within the rural areas on small sites, and the vast majority of this allowance will therefore naturally fall to be additions to the growth locations (presumably either as small sites or as part of larger allocations), and therefore it is in our view both misleading to refer to this as a 'smaller sites' allowance, and wholly appropriate for the Core Strategy to be acknowledging that this allowance can take the form of additions to the growth locations (which ties in with the Policy 10 references to the growth locations, all of which are minimum unit numbers). Presumably the same approach would be taken in Broadland.
6. We also question the appropriateness of the term 'small sites' for this element of the JCS housing allocation. This is a relative term, and while what may be considered a small site on the Norwich fringe, or at the main town of Wymondham could be as much as a couple of hundred dwellings, a small site in a service village, at the other end of the scale, may constitute only a few dwellings. We therefore suggest the term 'non-strategic/smaller sites' as an alternative. This is intended to acknowledge the different roles which the development allocated under this allowance may play. Additional allocations made through this allowance would not be large enough to be considered as being of strategic importance, or else they would be identified in the Core Strategy. However, within and adjacent to the larger settlements, they may not be of the 'small' scale that may be the case in the service villages and even Local Service Centres.
7. In this context, we turn then to consider the specific wording of Policies 14, 15 and 16, and the manner in which they address the 'additional development' situation.
8. What is immediately apparent is that allocating any substantial increase in development to any of the NPA settlements covered under these policies would create an inherent conflict between the implementation of the policy and the supporting text. In each case, the supporting text explains why a particular settlement or (in the cases of Policies 15 and 16) a particular group of settlements has been identified for the scale of development set out in the policy, and therefore any proposal to substantially increasing the number of homes at a later stage would be undermined by the justification to the policy itself.

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9. Taking Poringland as an example (the only South Norfolk Key Service Centre not a growth area), the supporting text explains why, having regard to past growth, a dispersed pattern of settlement, and limited job opportunities, the proposal is for 100-200 new homes only. It is not clear therefore how that justification would support any significant increase in new homes, to meet the 'non-strategic/smaller sites' allowance from South Norfolk. Similarly in Broadland, the lower level of development proposed for Brundall and Blofield is justified according to the specific characteristics of those settlements, so again it is not clear how they could then accommodate any development of any significance as part of the Broadland NPA allowance.
10. It is evident therefore that the role that any of these settlements could play in accommodating development over and above that allocated by Policies 14, 15 and 16 would be limited at best.
11. In our view, the problem that arises from the current wording in Policies 14, 15 and 16 in relation to the 'additional development' element is threefold:
  - Firstly, it creates confusion, because on the one hand each policy sets out and justifies a scale of development, and on the other hand, each policy goes on to say that a different level of development might actually come forward;
  - Secondly, it creates the false impression that the 'non-strategic/smaller sites' allowances for Broadland and South Norfolk can actually be met in any substantive way at the Villages and in the rural areas, which is not the case; and
  - Thirdly, it is not clear as to what the circumstances are in which the various Villages would be expected to exceed the quantum stated in each Policy, with the wording simply saying that this will happen "if necessary".
12. In our view, the solution to this situation is twofold: Firstly, there is a need for greater clarity and consistency in Policy 9 in relation to the 'non-strategic/smaller sites' allowance (we have suggested specific minor amendments in our representations to Matter 3C); Secondly, Policies 14, 15 and 16 need to be clearer both in respect of the scale of any additional development that might arise, and secondly provide a fuller explanation of the process by which it might become "necessary" to provide a small increase in the number of units proposed.
13. We set out and explain the proposed changes under Matter 10G below.

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**G 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.]**

14. Following on from our comments above, the specific proposed changes are as follows:

- (1) In Policy 9, change the third bullet point to read as follows:  
“South Norfolk smaller sites in the NPA and ~~possible~~ non-strategic sites at additions to the named growth locations.”
- (2) In Policy 14, the proposed scale of development for Blofield and Brundall is shown as being “approximately 50 dwellings”; the two growth locations (Hethersett and Long Stratton) are referred to as providing “at least” X dwellings. In all of these cases, therefore, the policy implies some flexibility in the actual scale of development to be achieved. The allocation for Poringland should in our view also say “approximately” 100-200 dwellings, so that all of the 5 NPA settlements explicitly have an element of flexibility to them;
- (3) In Policy 14, the penultimate paragraph should be re-worded as follows:  
“Settlements identified in this policy that are also within the Norwich Policy Area (marked \*) may be considered for small scale<sup>1</sup> additional development if ~~necessary~~<sup>2</sup> to help deliver the non-strategic/smaller sites<sup>3</sup> allowance provided for by Policy 9, if necessary, having first considered the potential for higher order settlements to accommodate additional development through the relevant Site Allocations DPD/Area Action Plan process.”<sup>4</sup>

Reasons for changes:

1. To make clear that any additional growth at these settlements will be small scale, rather than strategic;
  2. Re-wording to improve clarity;
  3. To avoid the misnomer that the unallocated element can only be met by small allocations, given the potential for increasing the scale of development at named growth locations; and
  4. To provide a fuller explanation of the circumstances in which additional growth may occur, and the sequence of search.
- (4) An additional supporting paragraph should be included as follows:  
“Policy 9 in relation to the strategy for growth includes an allowance for around 2,000 dwellings in Broadland and 1,800 dwellings in South Norfolk, either in the form of smaller sites or non-strategic sites at the named growth locations, within the NPA. Policy 9 provides that allocations to deliver these sites will in the first instance be made in accordance with the settlement hierarchy i.e. looking at the Norwich fringe and main towns (Wymondham) first, subject to environmental and servicing considerations. If it is not possible to accommodate all of that

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additional development at these higher order settlements, then the next stage would be to look at increasing the scale of development at the Key Service Centre growth locations (Hethersett and Long Stratton), followed by small scale increases at the remaining Key Service Centres in the NPA, and Policy 14 provides for this accordingly.”

(5) Policy 15 – amend the penultimate paragraph to match change 2 above.

(6) Add a supporting paragraph as follows:

“As set out at paragraph xxx (cross-reference to change 3 above), Policy 9 includes provision for the possibility of small scale additional growth at Service Villages, if necessary following consideration of higher order settlements, and Policy 15 above recognises the possibility that villages within the NPA may provide a slightly higher level of growth than paragraph 6.58 provides generally for Service Villages”.

(7) Policy 16 – amend the penultimate paragraph to match change 2 above.

(8) Add a supporting paragraph as follows:

“As set out at paragraph xxx (cross-reference to change 3 above), Policy 9 includes provision for the possibility of small scale additional growth at other villages, if necessary, following consideration of higher order settlements, and Policy 16 above recognises that possibility.

**15.** As far as we are aware, the above changes simply provide clarification as to the manner in which the ‘non-strategic/small sites’ allowance will be distributed through the Site Allocation/Area Action Plan process, following the principles already set out in Policy 9. Accordingly, we do not consider that any further sustainability appraisal or consultation would be needed.

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**11 October 2010**