Matter Number: 10 Representor Ref: 8607

Greater Norwich Development Partnership Joint Core Strategy Examination

Matter 10 Key Service Centres, Service Villages and Smaller Rural Communities (Policies 14-16)

Written Statement on behalf of Welbeck Strategic Land Ltd



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KEY SERVICE CENTRES (POLICY 14)

- A Does the JCS provide sound core strategic guidance for the future planning of these settlements? Does the evidence demonstrate that the key service centres are appropriately listed as such, with no additions/deletions?
- 1.1 It is not clear as to how and why particular Key Service Centres have been apportioned various growth targets. All have been identified as Key Service Centres and whilst some are to accommodate 100 200 units, locations such as Hethersett and Long Stratton will be allocated 1,000 And 1,800 units respectively. Furthermore, Cringleford has been apportioned a level of growth of 1,200 units and yet it is not even identified on the Settlement Hierarchy Map within the Joint Core Strategy (JCS).

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

1.2 Welbeck do not consider that the identification of individual villages has been soundly based. The Sustainability Appraisal July 2008 identified Long Stratton as an unsustainable location. However, the housing figure provided for Long Stratton is artificially high in order to deliver the bypass which is to be funded by developer contributions. Whilst Welbeck have no direct interest in Long Stratton, it is considered there has been no consideration of the viability impact on delivering the housing or any details relating to the delivery of the bypass. There is also no understanding or demonstration by the Greater Norwich Development Partnership (GNDP) as to what an acceptable level of development can be delivered in Long Stratton without the bypass.

THE SERVICE VILLAGES (POLICY 15)

- 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?
- 1.3 It is not clear as to how and why Service Villages in the GNDP area have been grouped together under the same bracket for development. Unlike the Key Service Centres, which have been apportioned various growth targets, Service Villages are to receive allocations 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.

Matter 10 Representor Ref: 8607

- 1.4 Clearly there are some Service Villages that have a greater function than others. Furthermore, some are located within the NPA and these locations are likely to receive higher pressure for new housing and supporting infrastructure. It seems strange that locations such as Mulbarton, which have a good range of local shops and education facilities, are grouped together with locations which have little more than a village shop.
- 1.5 At Regulation 25 consultation stage, Mulbarton was considered as part of the Mangreen New Settlement proposal under 'major growth location' option 3. A substantial amount of work was undertaken by South Norfolk Council in support of this proposal. The masterplan was presented to local stakeholders and showed development from the eastern boundary of Mulbarton, stretching to existing villages of Mangreen, Swardeston and Swainsthorpe. The proposals incorporated 4,500 units and the general location was considered the most sustainable outside of Norwich.
- 1.6 Apart from existing facilities, Mulbarton is also set apart from many other Services Villages dues to its location within the NPA. It has extremely good transport links to the edge of Norwich including Park and Ride facilities on the A47. Para 2.2.56 of the Sustainability Appraisal 2009 states that the preferred option for the distribution of housing growth within South Norfolk District proposes the dispersal of growth across a greater number of smaller sites. Mulbarton is identified, along with Poringland, as a potential location for smaller developments which would facilitate incremental improvements to good existing bus links to Norwich. Welbeck wholly support this view and confirm that any future development in Mulbarton will facilitate such requirements.
- D Is the scale of development for the individual villages soundly based? Other villages (policy 16):
- 1.7 No Comment
- Does the JCS provide sound core strategic advice for the future planning of these villages? Does the evidence demonstrate that the 'other villages' are appropriately listed as such, with no additions/deletions? Allowance for development on 'smaller sites in the NPA' (policies 9 and 14 -16):
- 1.8 No Comment

18359/A5/EH 2 October 2010

Matter 10 Representor Ref: 8607

- Poes 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?
- 1.9 Welbeck consider that the 'smaller site allowance' should be accommodated in sustainable locations with core local facilities, such as Mulbarton. At present the policy does not differentiate between those Services Villages with a high level of local facilities, and those with very few.
- 1.10 The policy wording states that the additional development (1,800 units for South Norfolk and 2,200 units for Broadland) will be located on smaller sites in the NPA. Welbeck agree that the additional development should be located within the NPA part of the GNDP, as opposed to the RPA. However, whilst a number of locations are immediately discounted on this basis, the policy wording is still very open and does not identify the Service Villages best placed to accommodate higher levels of development. We feel additional guidance on this matter would be helpful to all involved.
- 1.11 Furthermore we do not consider that the 'floating' 1,800 units should be allocated in locations that are already subject their own specific strategic allocations. The hierarchy of these settlements has been set and the housing numbers allocated accordingly and if the intention is to allocate further housing in these locations, this assessment should have been taken through the previous iterations of the plan.
- 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.]
- 1.12 The amended Policy 15 below allocates should provide the mechanism to achieve Soundness.

Policy 10

In each Service Village land will be allocated for 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 in the RPA which will see the minimum pressure for housing will be subject to small scale infill development. The smaller Services Villages in the NPA which will see moderate pressure for housing will be subject to

Matter 10 Representor Ref: 8607

small housing allocations. The larger Services Villages in the NPA which have a greater level of existing services will be the subject of larger housing allocations through delivery of the 'smaller sites in the NPA' allowance as outlined in Policy 9.

18359/A5/EH 4 October 2010