

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 Landstock Estates Ltd
and Landowners Group

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 The JCS identifies five levels of settlement: Norwich, Main Towns, Key Service Centres, Service Villages and Linked Service Villages. Classification is helpful in that it serves to identify those settlements best able to assimilate development in a robust and sustainable manner.

1.2 Policy 14 identifies the level of development to be provided subject to detailed assessment and infrastructure. Two questions arise:

- Is further guidance required in the JCS as to the scope of such detailed assessment and
- How would any shortfall be addressed.

In terms of the latter point, we have proposed in our statement in response to matter 1 that a new policy 9A or similar is considered to provide further flexibility. In terms of detailed assessment, the issues are:

- The environmental capacity of the settlement;
- The capacity of social and community facilities;
- The rate of change/growth and how the new development can be assimilated into the existing community;
- Capacity of infrastructure (traffic and transport, water cycle etc).

1.3 The SEA/SA ought to have tested the principles and we set out below the inconsistency between the SEA/SA in respect of Long Stratton for example. We note that Policy 14 does cross reference to the spatial planning objectives and the explanatory text does set out a range of issues with the various settlements. The policy and/or explanatory text could be enhanced by reference to the above.

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

1.4 Our concerns lie not with the principle of the allocation of development to Key Service Centres but with the level of development identified for particular settlements which does not appear to be balanced or soundly based upon the evidence base.

- 1.5 For instance, Poringland is a similar distance from Norwich as Hethersett and significantly closer than Long Stratton. All have been identified as Key Service Centres with Hethersett and Poringland both considered to have a good range of services. Yet Poringland is only proposed to accommodate 100 – 200 units as opposed to 1,000 units at Hethersett and 1,800 units at Long Stratton. The JCS justifies the Poringland allocation is in para. 6.54 due to the fact that *'it has significant housing commitments not built, therefore an allocation of only 100 – 200 is proposed'*. This is not appropriate when the evidence base (the SHLAA) suggests that Poringland could accommodate a greater level of development as a number of sites have been identified. Furthermore, given the historic lack of a demonstrable 5 year supply in the NPA, question marks remain over the delivery of the allocated sites yet to be developed via the floating provision of 3,800 dwellings in the NPA as stated in the JCS.
- 1.6 Likewise, the Sustainability Appraisal (September 2010) (JCS 3) p VIII states *'However, one of the major growth locations – Long Stratton – does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA.'*
- 1.7 The level of housing identified for Long Stratton is driven not by what the SA considers appropriate or the effect of development in this location, but by the need to fund a bypass, a requirement falling directly on the developer. There has been no consideration of the viability impact on delivering the housing nor any details relating to the delivery of the bypass. There is also no understanding or demonstration by the GNDP as to what effects and impacts the development being promoted will have on Long Stratton as a town by increasing its population by some 81% over a very short period of time.

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?**

- 1.8 No Comment.

D Is the scale of development for the individual villages soundly based? Other villages (policy 16):

1.9 No Comment.

E 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):

1.10 No Comment.

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?

1.11 We consider that the 'smaller site allowance' should be accommodated in sustainable locations such as Wymondham or the Key Service Centres such as Poringland. The JCS needs to be explicit within Policy 9 as to how the 3,800 (1,800 + 2,000) dwelling 'floating' allocation could affect the Key Service Centres. This is addressed in greater detail in Matter 01.

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 9 and new Policy 9a as set out in Matter 01 provides the mechanism to achieve Soundness. It will also be necessary to address Policy 14: Key Service Centres which identifies a specific quantum of development in the Key Service Centres.