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Hearing Statement: Matter 10

Paul Dunthorne [8216]

Agent ref: [390]

Hearing Statement

Greater Norwich Joint Core Strategy
Development Plan Document
Matter 10

BIDWELLS



Quality Assurance

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Prepared by: John Long BA (Hons) Dip TP MRTPI

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Reviewed by: Graham Bloomfield BA (Hons) Dip TP MRTPI

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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 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 (JCS) 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 10) should be read in conjunction with the accompanying statement for Matter 3.

2 MATTER 10 (C AND D): KEY SERVICE CENTRES, SERVICES VILLAGES, AND SMALLER RURAL COMMUNITIES (POLICY 15)

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?

- 2.1 Rackheath is identified in Policy 15 as having equivalent status to a Service Village, while providing a location for significant housing. Policy 15 suggests that Service Villages will be suitable locations for small-scale 'non-strategic' housing allocations.
- 2.2 In Rackheath's case this must be in addition to strategic housing allocations suggested in Policy 10. However, this is not reflected in Policy 10 (see Paul Dunthorne's Statement for Matter 3) or properly acknowledged in Policy 15 (see comments below).
- 2.3 Policy 15 and Policy 10 should be clearer and more explicit about Rackheath's role as a suitable place for both strategic and non-strategic levels of growth.
- 2.4 Policy 15 should provide more certainty that allocations will be made for 'non-strategic' growth in Rackheath, separate from the strategic growth provisions in Policy 10 (Eco-community), whether this be through an AAP, SPD, or site allocations DPD.
- 2.5 Policy 15 also fails to convey a consistent approach for Rackheath's growth beyond 10-20 dwellings. Policy 10 identifies the village as a location for 'strategic' levels of growth. However, Policy 15's reasoned justification/supporting text (paragraphs 6.58-6.59) suggests that non-strategic' housing growth at Service Villages in the NPA (including Rackheath)

beyond 10 to 20 homes will only take place, where there is a shortfall in housing numbers elsewhere.

- 2.6 Notwithstanding the inconsistencies between Policy 15 and Policy 10 and Broadland Council's apparent stance on small sites at Rackheath, Policy 15's approach to smaller 'non-strategic' growth at Rackheath is too limiting and does not take into account Rackheath's special planning circumstances. Policy 15 potentially restricts the potential allocation of 'non-strategic' growth to less than 20 homes. This is despite the village's identification as a strategic growth location, its existing range of services and any new facilities that are anticipated to come forward as part of the Eco-community proposals
- 2.7 Policy 15 needs to specifically acknowledge that smaller 'non strategic' sites will be allocated at Rackheath and that the settlement is capable of accommodating 'non-strategic' growth beyond 20 dwellings to contribute to meeting Rackheath's local housing need, particularly in the short term before the proposed eco-community begins delivering substantial numbers of new housing or in the event that the Eco-town program is scaled back, delayed or revoked.
- 2.8 The most appropriate strategy for Rackheath is to allow for non-strategic growth beyond 10-20 homes, irrespective of whether there is sufficient housing numbers elsewhere in the NPA, providing it can be demonstrated that Rackheath's growth would contribute to sustainable development, meet local needs and not prejudice the delivery of the Eco-Community.
- 2.9 The upper limit of non-strategic growth at Rackheath should be based on meeting the needs of local people, improving and supporting local services and the ability of the settlement to accommodate growth.

Suggested Changes to Policy 15

- 2.10 Policy 15's justification (par 6.58-6.59) should be changed to state that:

'... at Rackheath, there is potential for non-strategic' growth at the village beyond 20 dwellings, the upper limit of growth will be determined on the basis of meeting the housing needs of local people (particularly in the period before the Eco-community delivers substantial numbers of housing) and the ability of the settlement to accommodate growth, within infrastructure capacity limits. Non-strategic growth at Rackheath will contribute to the Broadland smaller sites in the NPA allowance (2000 homes in Broadland)''.

Does the JCS make clear what mechanism(s) will be used for resolving whether or not 'additional development' is necessary at any of the...service villages...to deliver the small 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?

- 2.11 The JCS does not currently provide sufficient guidance on how the smaller sites in the NPA will be allocated. Amendments to Policy 10 and Policy 15, as suggested above and in Paul Dunthorne's Statement for Matter 3, would help provide more certainty on the mechanism for delivering a proportion of the smaller sites allowance, by specifically acknowledging that 'non-strategic' growth in Rackheath, i.e. outside of the Eco-community proposals will contribute towards meeting the smaller sites in the NPA allowance (2000 homes in Broadland).

Contact us

BIDWELLS

Bidwells Norwich

16 Upper King Street
Norwich
Norfolk
NR3 1HA

t: **01603 763939**

f: **01603 763899**

England

Cambridge
Chelmsford
Ipswich
Kings Langley
London
Milton Keynes
Northampton
Norwich
Saffron Walden

Scotland

Fort William
Inverness
Perth

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