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Hearing Statement: Matter 10

Hethersett Land Ltd [8570]

Agent ref: [390]

Hearing Statement

Greater Norwich Joint Core Strategy Development Plan Document Matter 10 BIDWELLS



Quality Assurance

Site name: Land at Hethersett, South Norfolk (SS39600009)

Client name: Hethersett Land Ltd

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Signed

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Bidwells on behalf of Hethersett Land Ltd. It relates to:
 - Representations submitted by Bidwells, on behalf of Hethersett Land Ltd to the presubmission version of the Greater Norwich Joint Core Strategy and the Statement of Focussed Changes in respect of Policy 4 (Housing Delivery), Policy 9 (Strategy for growth in the NPA), Policy 10 (Locations for major new or expanded communities in the NPA), and Policy 14 (Key Service Centres) (Respondent ID: 8570); and
 - A Statement of Common Ground agreed between the GNDP and Hethersett Land Ltd covering Matters 2 and 3.
- This Hearing Statement is intended to amplify the representations made by Bidwells at the pre-submission stage of the Joint Core Strategy's production and update those comments in light of the suggested Focussed Changes and publication of new evidence, including the Drivas Jonas Deloitte Affordable Housing Viability Study (July 2010) and Local Investment Plan and Programme (September 2010).
- 1.3 Since the issues raised in the representations are relevant to Matters 2, 3, and 4, this statement (for Matter 10) should be read in conjunction with the accompanying statements for Matter 2, 3 and 4 and the agreed Statement of Common Ground between GNDP and Hethersett Land Ltd (Covering Matters 2 and 3).
- 1.4 For information, Hethersett Land Ltd is taking forward the promotion of the land at Hethersett on behalf of landowners in control of land to the north and south of Hethersett.
- 1.5 The location and extent of the land being promoted (approximately 315 hectares) is shown in Appendix A.
- 1.6 The Statement has been sub-divided under the questions posed by the Inspectors in their Matters & Key Questions for Examination at the Hearings Document (20/08/10).
- 2 MATTER 10 KEY SERVICE CENTRES, SERVICE VILLAGES, AND SMALLER COMMUNITIES (POLICY 14-16)

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?

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

- 2.1 The Statement of Common Ground between the GNDP and Hethersett Land Ltd confirms the agreed position on Matter 3 (part C), for Hethersett which is also relevant to Matter 10 Key Service Centres, given Hethersett's identification in Policy 14 as a Key Service Centre.
- 2.2 In summary, Hethersett Land Ltd agrees that the evidence, including the Sustainability Appraisal demonstrates that Hethersett is a sustainable location for housing growth and provides opportunities to deliver a step change in transport by means other than the private motor car, given its location close to existing and proposed jobs (NRP, Hethel and Norwich City Centre) and position on Norwich's main public transport corridor (A11 Newmarket Road).
- 2.3 Hethersett Land Ltd suggests that Hethersett's position as a 'Key Service Centre' in the settlement hierarchy does not artificially limit the level of growth at the village and that the JCS allocates an appropriate level of growth.
- 2.4 Hethersett Land Ltd suggest that all of the various options for growth at Hethersett proposed by the GNDP throughout the JCS's evolution (1,000 to 4,000+ homes) have all been based on robust and credible evidence and justified in terms of the Sustainability Appraisal, Strategic Housing Market Assessment, Strategic Housing Land Availability and other evidence.
- 2.5 Hethersett Land Ltd suggest that the JCS's current policy requirement for "at least" 1,000 homes to be allocated at Hethersett, alongside a viable CIL and flexible Section 106 Agreement approach provides the ability to deliver sustainable development in the village.
- 2.6 Hethersett Land Ltd can demonstrate that the GNDP has correctly asserted that strategic growth and expansion of Hethersett by at least 1,000 homes should be to the North/North East of the village.
- 2.7 Hethesett Land Ltd suggest that there is capacity to accommodate more than 1,000 homes in Hethersett without impacting adversely on the villages character and that there are no known technical reasons to limit the growth to 1,000 homes.
- 2.8 However, Hethersett Land Ltd acknowledges the GNDP's decision to reduce the housing figure at Hethersett from 4000 homes to at least 1,000 homes. Although it does consider that the GNDP's earlier 'preferred option' for growth, would have resulted in a more sustainable strategy, than the current option (2+, the Favoured Option), i.e. including 4,000 homes at Hethersett.

Allowance for development on "smaller sites in the NPA" (Policy 9 and 14-16)

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 centre, 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 clear/more specific about this? What would it need to say.

- 2.9 Whilst acknowledging the GNDP's decision to reduce Hethersett housing allocation from 4,000 to 1,000 homes. Hethersett Land maintains that the village is capable of accommodating growth beyond 1,000 homes including a proportion of the smaller sites in the NPA Allowance, currently 1,800 for South Norfolk.
- 2.10 However, the JCS fails to provide any clear guidance on how or when the additional growth beyond those already indentified at locations in the NPA, including Hethersett will be decided. Also, there appears to be little rationale why the JCS has not sought to be more specific about the "smaller sites in the NPA allowance", in terms of phasing and geography.
- 2.11 What the JCS should have done is to individually specify the level of growth to be provided at each of the identified Key Service Centres, based on an assessment of the capacity of each of the settlements to accommodate sustainable growth, taking into account environmental and infrastructure capacity, local housing needs, and the availability of suitable development sites etc., rather than leave a significant 'floating' unallocated figure, to be determined at some unspecified point in time by an unspecified mechanism.
- 2.12 This way the JCS could have been more specific about the level of growth to be accommodated and therefore be more specific about how the "smaller sites in the NPA allowance" would be distributed. This would have provided a robust framework for the preparation of site allocation DPDs, based on local needs and the ability of settlements to accommodate sustainable growth.
- 2.13 Alternatively, the JCS should have a provided the criteria for determining the level of growth to be accommodated at settlements in the NPA, to provide at least some certainty about how and when the "smaller sites in the NPA allowance" will be distributed.

Conclusion

2.14 Hethersett Land Ltd are confident that they can demonstrate with evidence that land to the North/North East of Hethersett can accommodate at least 1,000 homes and a proportion of the "smaller sites in the NPA allowance", and it is appropriate for the JCS to specify the level of additional growth to be accommodated at Hethersett to meet this growth.

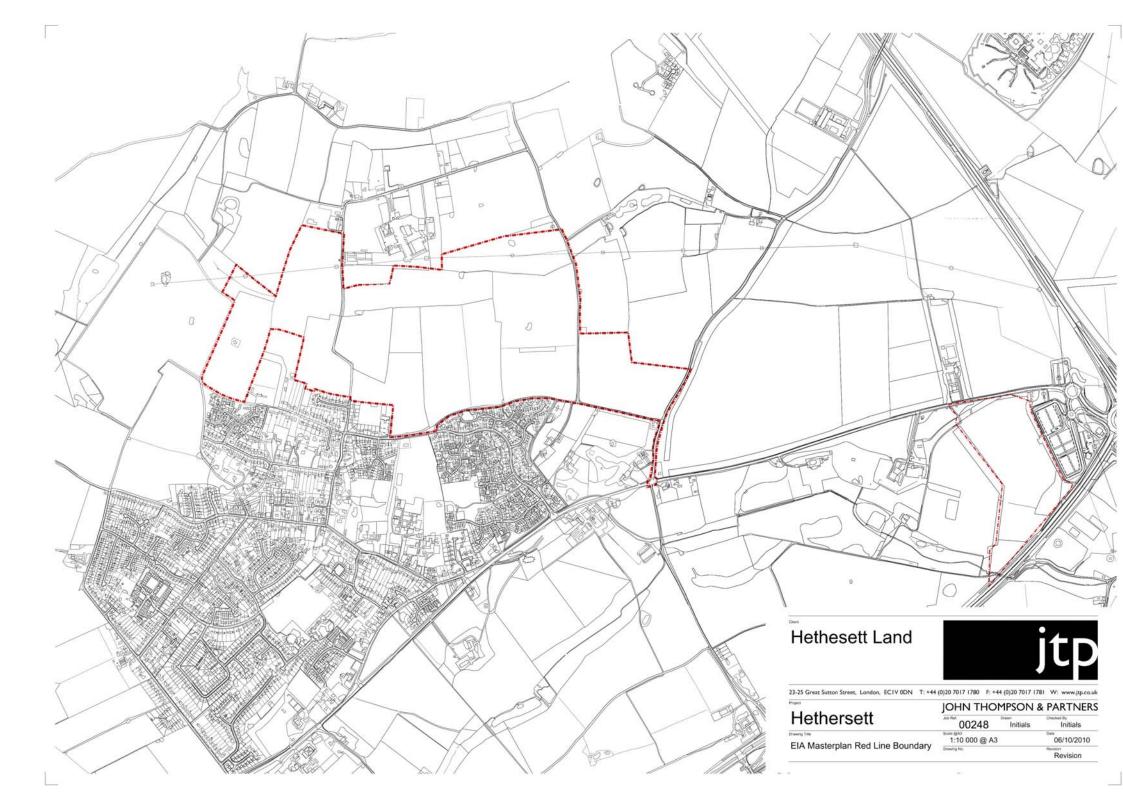
2.15 Hethersett Land Ltd intends to submit a planning application for growth at Hethersett in line with the JCS following the publication of the final Inspector's Report/Adoption of the JCS in early 2011. If the scheme is consented in 2011, it is anticipated new homes will begin to be delivered in 2012/13. Delivery rates are anticipated to reach 100 homes per annum by 2015, increasing to higher levels thereafter.

Suggested Change

- 2.16 The JCS should be amended to distribute appropriate additional levels of housing growth to settlements based on their ability to accommodate sustainable growth. This should be informed by an assessment of local housing need, location, access to services, jobs and facilities, environmental and infrastructure capacity, the ability to increase capacity and availability of suitable development land.
- 2.17 For Hethersett, Hethersett Land Ltd suggest that this figure is higher than the 'at least' 1,000 suggested in the Policy and are confident that this can be proven with evidence. If required and deemed appropriate, Hethersett is capable of accommodating a proportion of the 1,800 "smaller sites in the NPA allowance."

Appendix A

Plan Indicating Promoted Land



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