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**Matter 2**

**Issue 2: Housing growth**

**Q3: Are all the settlements listed in the correct level within the hierarchy?**

**Q7: Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan (VCHAP) justified?**

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**1 Q3: Are all the settlements listed in the correct level within the hierarchy?**

- 1.1 This supplementary statement is submitted to acknowledge an anomaly within the settlement hierarchy and request that sites located adjacent and spatially connected to the Norwich Urban Fringe parishes but within a parish which falls in a settlement lower in the hierarchy are considered in a comparable manner.
- 1.2 We do not disagree with the Partnership's general approach to the identification of the settlement hierarchy although it is important to recognise where anomalies inevitably occur in matching administrative parish boundaries with sensible spatial planning criteria.
- 1.3 Our client's interest at sites GNLP0332R and 0334R are partly located in the parish of Horsford and partly in the parish of Hellesdon. The site assessment booklets have identified the location of the sites within Horsford [Doc 1.39] and therefore a Broadland Village Cluster location in the settlement hierarchy. The sites, in fact, relate closely to the urban fringe parish of Hellesdon, where in spatial planning terms facilities and services would be more appropriately accessed and shared.
- 1.4 Equally, the contingency site GNLP2043/0581 is referred to in all assessment documents as being within the parish of Costessey and therefore related to the Urban Fringe hierarchy. The site is, in fact, in the parish of Bawburgh which under normal circumstances would be a parish considered under the emerging South Norfolk Village Clusters Housing Site Allocations Local Plan. For clarity, we have no objection to the consideration of the Costessey contingency site as part of the Norwich Urban Fringe hierarchy. It is though appropriate to acknowledge that the same flexibility should also apply to sites GNLP0332R and 0334R.

**Recommended remedy**

- 1.5 We recommend elsewhere that the Partnership should be advised to consider the allocation of additional land for housing development, the identification of additional or alternative contingency sites or both. In carrying out this exercise, we respectfully request that a comparable approach is adopted in the consideration of sites which have a clear spatial relationship with facilities and services within the Norwich Urban Fringe.
- 2 Q7: Is the figure of 1,200 homes assigned to the South Norfolk Village Clusters Housing Site Allocations Local Plan (VCHAP) justified?**
- 2.1 The Partnership has sought to answer the Inspectors' two initial questions in relation to the preparation of the VCHAP [Doc D1.4A paragraphs 9-26]. In our view, the Partnership has failed to justify the figure of 1,200 homes or provide convincing evidence to confirm that sufficient deliverable sites can be identified.
  - 2.2 While we do not disagree with a strategic spatial approach which acknowledges how rural villages can operate in sustainable partnership it is unhelpful that the GNLP, which purports to demonstrate its ability to meet housing need in the whole of the GNLP area including South Norfolk Council's rural area, cannot confirm as part of the same process, the ability to deliver 1,200 homes in suitable locations. In the consideration of soundness of the GNLP there remains a 'gap' in knowledge and ability to assess.



- 2.3 The original intention of South Norfolk Council and the Partnership was to ensure that the VCHAP would be prepared on the same timetable as the GNLP and would be presented at a joint examination. However, clearly this has not been achieved.
- 2.4 In response to the Inspector's initial questions, the Partnership direct us to the Village Clusters Topic Paper [D 3.12 paragraph 41] which appears to contend that South Norfolk Council are satisfied that sufficient suitable sites have been promoted by landowners and developers to deliver in excess of 1,200 homes. However, we cannot interrogate this contention and confirm one way or the other that site selection is justified or effective. One therefore must assume, instead, that there may well be a shortfall from this source.
- 2.5 It is equally not acceptable to suggest, as the Partnership does, in paragraph 23 of their response to the Inspectors' initial questions [Doc D1.3] that it might not matter because there are sufficient other sites allocated in the GNLP to meet the housing needs leaving no *"significant consequences for delivering the overall GNLP strategy"*. Firstly, as explained elsewhere, the Partnership continue, properly in my view, to contend that the number of sites identified for allocation is appropriate in the circumstances of the GNLP. These circumstances include the clear pressure and concerns about the delivery trajectory of a number of major strategic sites within the plan. The 1,200 homes anticipated to be delivered from the VCHAP are also an integral part of meeting the housing needs and delivering the strategy and vision set out in Section 5 of the submission Local Plan [Doc A1]. An essential part of the growth strategy of the plan is explained in paragraph 188 page 50 of the submitted plan. *"The approach to village clusters is innovative. It reflects the way people access services in rural areas and enhances social sustainability by promoting appropriate growth in smaller villages. It will support local services, whilst at the same time protecting the character of the villages."* It is disappointing that the Partnership is so unashamed in its willingness to abandon key elements of the GNLP strategy.

#### **Recommended remedy**

- 2.6 I am tempted to suggest that until and unless the VCHAP progresses to the same stage in its preparation process as the GNLP, further progress on the GNLP should be halted and then examined at the same time as the VCHAP. However, in order to allow the GNLP process to progress and site delivery to commence as soon as possible, an alternative approach would be to advise the Partnership to consider the allocation of additional land for housing development, the identification of additional or alternative contingency sites or both.