

PROJECT TITLE: GREATER NORWICH LOCAL PLAN - EXAMINATION HEARINGS
PROJECT REF: 5624
DATE: 14 JANUARY 2022
PREPARED BY: PW

WOODS HARDWICK PLANNING HEARING STATEMENT IN RESPECT OF MATTER 3 - ISSUE 4 VILLAGE CLUSTERS

- 1.1 This Hearing Statement is prepared in respect of Woods Hardwick Planning Limited's appearance at the Greater Norwich Local Plan Examination Hearings on behalf of Gosford Ltd in respect of Matter 3 - Issue 4 Village Clusters. It seeks to respond to the questions set out in the Inspectors Matters and Questions (Part 1) and responds to each of the questions in turn.
- 1.2 We are also appearing at the Examination on behalf of Gosford Ltd in respect of Matter 2 - Issue 2 Housing Growth and Matter 3 - Issue 5 Small scale windfall housing development. We are relying on our original Regulation 19 representations in respect of Matter 2 - Issue 2 and have prepared a further separate Hearing Statement in respect of Matter 3 - Issue 5.

1. Is Policy 7.4 in respect of additional sites justified and effective? Is there a limit to how many such schemes could be allowed within one village?

- 1.3 We consider that the policy is effective and justified in so much as it seeks to allocate a proportion of the Local Plan's housing requirement to the village clusters. However, as set out in our Regulation 19 representations in respect of Policy 1, Table 6 and Policies 7.1 to 7.4, we consider that the number of homes allocated to the village clusters should be increased to reflect the percentage proportionate distribution of housing allocations to the settlement hierarchy set out at the Regulation 18 Stage C consultation and also having regard to our representations that the small scale windfall homes to be delivered through Policy 7.5, together with the additional windfall allowance, should be excluded from the total housing supply figure for the Local Plan area as set out at Table 6 and Policy 1.
- 1.4 Policy 7.4 states that new sites in the village clusters in Broadland to provide the required 482 homes under the current drafting of the policy are allocated in the Greater Norwich Local Plan Sites Plan and we note that the housing numbers for each village are set out at Appendix 5 to the Local Plan. The 'Sites Plan' is the Local Plan Part 2 - The sites, section 6 of which sets out allocations for each of the Broadland Village Clusters. This should have the effect of limiting how many schemes could be allowed within one village under this policy. Allocation of sites within the South Norfolk Village Clusters area will be a matter for the South Norfolk Village Clusters Housing Allocations Local Plan and once sites have been allocated this should have effect of limiting the number schemes that could be allowed in any one village under this policy. There is however no limit to how many sites could be allocated within one village under the terms of the policy.

2. Is it clear what the 'Greater Norwich Local Plan Sites Plan' referred to in this policy is? Is it simply the Greater Norwich Local Plan ie the submitted plan?

- 1.5 We assume that the 'Greater Norwich Local Plan Sites Plan' is the Local Plan Part 2 - The Sites. The policy could be made clearer by referencing the Local Plan Part 2 specifically.

3. How does this policy relate to Policy 7.5?

- 1.6 Our understanding is that Policy 7.4 is to be read separately to Policy 7.5. Policy 7.5 allows for and assumes the delivery of additional windfall housing over and above that envisaged to come forward under Policy 7.4 and also relates to all the parishes within the Local Plan area.

4. Would Policy 7.4 encourage new dwellings to be constructed in locations that are poorly served by public transport, services, and facilities? Would it be consistent with national policy in this regard?

- 1.7 We consider that the general approach to the allocation of housing sites to the Villages Clusters is consistent with national policy. Under the heading of ‘Rural housing’, paragraph 79 of the National Planning Policy Framework (July 2021) (NPPF) seeks to promote sustainable development in rural areas and notes that housing should be located where it will enhance or maintain the vitality of rural areas. Paragraph 79 further states that ‘Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services’ and that ‘Where there are groups of smaller settlements, development in one village may support services in a village nearby’.
- 1.8 The overall strategy of the Local Plan is to focus housing growth in the Norwich urban area, the main towns and key service areas within the settlement hierarchy and, as the Councils note at paragraph 79 of the Topic Paper: Policy 7.4 Village Clusters (page 16), the number of homes proposed in the village clusters represents about 9% of the total housing growth and a 9% increase on existing stock. In a Local Plan area such as Greater Norwich, which includes a large rural area and significant number of rural settlements, it is important that an appropriate percentage of new housing is allowed in the rural area in order to enhance and maintain the vitality of rural areas as required by the NPPF.
- 1.9 Indeed, we have made the case within our Regulation 19 representations that the allocation to the village clusters should be increased as noted at paragraph 1.3 above. Even with this proportionate distribution and associated uplift to the village clusters numbers, the number of homes proposed in the village clusters would still represent only approximately 10% of the total housing growth envisaged in the Local Plan.

5. Will this policy apply in the area covered by the South Norfolk Villages Clusters Housing Allocations Local Plan?

- 1.10 This policy will apply in so much that it aims to set the minimum number of homes to be allocated within the South Norfolk Village Clusters area. Once adopted, the South Norfolk Village Clusters Housing Allocation Local Plan will be read alongside the GNLP Part 2 - Sites to complete housing allocations in the development plan for the Greater Norwich Area.

6. Has any allowance been made within the housing trajectory for such windfall sites?

- 1.11 We note that the Councils’ Housing trajectory for the period 2018/19 to 2037/38 is set out at Table 4 to Appendix 4 (page 22) of the Councils’ Topic Paper: Policy 1 Growth Strategy. This indicates that housing under the South Norfolk Village Clusters Plan will start to be delivered in 2024/25. We assume that delivery in the Broadland Village Clusters is covered within the ‘Broadland Forecast’ as there is no separate entry for the Broadland village clusters.

7. Is Policy 7.4 otherwise justified, effective, and consistent with national policy?

- 1.12 We consider that the policy is justified, effective and consistent with national policy in so much that it seeks to allocate a proportion of the Local Plan’s housing requirement to the Village Clusters, but is currently not sound on the basis that the number of homes allocated to the village clusters should be increased as noted at paragraph 1.3 above and set out within our Regulation 19 representations.