

# **GREATER NORWICH LOCAL PLAN**

## **INSPECTORS MATTERS ISSUES AND QUESTIONS (PART 1)**

Matter 3: Strategy for the Areas of Growth  
Issue 4 Village Clusters

**ON BEHALF OF HJ COLLEN & SON**  
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## **1 Introduction**

- 1.1 Wilson Wraight LLP is instructed by HJ Collen & Son to respond to the Greater Norwich Local Plan Examination Matters and Questions produced by the Inspectors appointed to hold an independent examination of the Joint Local Plan. This Statement relates to 'Matter 3 – Strategy for the Areas of Growth' with a specific focus on Issue 4 'Village Clusters.'
- 1.2 This submission follows representations submitted to the Regulation 19 stage and the Village Clusters Housing Allocations Plan (VCHAP) which is being prepared by South Norfolk Council.
- 1.3 The previous representations related to sites in Toft Monks which are being promoted for future housing development within the next plan period to 2038.

## 2 Representations

### Issue 4 Village Clusters

#### 3. How does this policy relate to Policy 7.5?

- 2.1 Policy 7.5 provides much needed additional flexibility to assist the Council's with maintaining an adequate housing land supply should some allocations in the South Norfolk Village Clusters Housing Site Allocations Plan fail to deliver.
- 2.2 There are any number of reasons for allocated sites to fail to come forward as expected during a plan period. Unforeseen planning constraints, ownership issues and legal disputes are often only discovered once a site has the certainty that an allocation provides, for the landowner to move forward with a planning application.
- 2.3 Our client therefore fully supports the GNLP's aspirations of committing to a level of growth within the South Norfolk village clusters and seeking to deliver this growth through allocations in rural locations with access to jobs and services, but also allowing the flexibility provided by Policy 7.5.

#### 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?

- 2.4 The Policy 7.4 Topic Paper sets out how the concept of village clusters was discussed at paragraph 4.19 of the 'Towards a Strategy' document which states the following:

*"Board members have been clear that they favour an approach that places all remaining areas of Greater Norwich within a village cluster based on primary school catchments. To reduce additional car journeys and encourage healthy and active lifestyles, and reduce the risks to soundness, it is advisable to limit new housing allocations to sites within the cluster with good access to a primary school and a 'safe route to school'. The scale of growth in any cluster will reflect school capacity or ability to grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other*

*uncertainties, such as pupil preference, it is reasonable to assume that a minimum scale of allocation (15 to 20 dwellings) can be accommodated in all clusters if appropriate sites are available. The identification of sites with the fewest constraints will also help to determine the amount of growth in specific clusters.”*

- 2.5 It can therefore be seen that the policy has been designed to be consistent with national policy as the village clusters are based on school catchments to avoid new dwellings being constructed in unsustainable locations.
- 2.6 Village Clusters, such as Toft Monks, are sustainable rural locations that provide access to services, including primary schools, as well as access to employment opportunities and public transport links. Development in these locations will, in accordance with the NPPF, assist in enhancing and maintaining the vitality of rural communities.
- 2.7 Accordingly, it is wholly appropriate that Village Clusters should be identified as locations to accommodate a reasonable amount of growth (approx. 9% of the total housing growth) during the period to 2038.
- 2.8 Our client therefore fully supports the GNLP’s aspirations of committing to a level of growth within the South Norfolk village clusters and seeking to deliver this growth through allocations in rural locations with access to jobs and services.
- 2.9 Overall, the Village Clusters Plan will assist the Council with meeting the national policy objectives set out in the NPPF by providing much needed new housing which will contribute towards maintaining a supply of deliverable sites and protect village communities whilst supporting rural services and facilities.
- 2.10 On this basis, the Policy as proposed is considered to be consistent with national policy and therefore sound.

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

- 2.11 Paragraph 7 of the NPPF states “The purpose of the planning system is to contribute to the achievement of sustainable development.” Paragraph 8 sets out three overarching objectives which must be addressed in order for the planning system to achieve sustainable development. The NPPF defines the first as the ‘economic objective’ which aims "to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure."
- 2.12 Policy 7.4 will enable direct economic benefits through the creation of jobs both during the construction and operational phases, as well as delivering new homes which will support wider economic growth in the local areas and district. The new residents will also create an increase in local expenditure at the services and facilities in this rural part of the district.
- 2.13 Paragraph 79 seeks to promote sustainable development in rural areas and states that housing should be located where it will enhance or maintain the vitality of rural communities. It requires planning policies to identify opportunities for villages to grow and thrive, especially where this will support local services; “where there are groups of smaller settlements, development in one village may support services in a village nearby.”
- 2.14 The NPPF defines the second overarching objective as the ‘social objective’ which aims "to support, strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."

- 2.15 The proposal will help contribute towards the supply of high-quality housing in accordance with the requirement of the NPPF to significantly boost the supply of new housing (paragraph 59). The new dwellings will also maintain and enhance the vitality of the communities by supporting existing nearby services and community groups.
- 2.16 The NPPF confirms that the third overarching objective is the 'environmental objective' which aims "to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, use natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."
- 2.17 Paragraph 80 is of particular relevance to this policy because it seeks to avoid the development of isolated homes in the countryside. There are clear benefits to delivering an element of the district's housing in the village cluster locations instead of in other environmentally sensitive locations in open areas of countryside.
- 2.18 Furthermore, by virtue of the modern building regulations to which the properties will be built, the development will automatically introduce more sustainable homes to the market in terms of carbon usage.
- 2.19 Our client therefore fully supports the GNLP's aspirations of committing to a level of growth within the South Norfolk village clusters and seeking to deliver this growth through allocations in rural locations with access to jobs and services.
- 2.20 Overall, Policy 7.4 will assist the Council with meeting the national policy objectives set out in the NPPF by providing much needed new housing which will contribute towards maintaining a supply of deliverable sites and protect village communities whilst supporting rural services and facilities.
- 2.21 On this basis, the Policy as proposed is considered to be justified, effective, and consistent with national policy.



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