
Greater Norwich Local Plan

Local Plan Examination
Hearings Statement relating to:
Matter 3 / Issues 3 and 4

On behalf of
Barratt David Wilson Homes (Eastern Counties)



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Matter 3 – Strategy for the Areas of Growth

Issue 3 – The Key Service Centres

Question 2. Is Policy 7.3 otherwise justified, effective, and consistent with national policy?

No.

In our response to Matter 2, Issue 2, Questions 2, 3 and 4 (replicated below), we explain that the settlement hierarchy in the draft Plan is not based on an up-to-date assessment and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

[Matter 2 / Issue 2] Question 2. Is the settlement hierarchy set out in Policy 1 appropriate and consistent with the evidence?

No.

There is an absence of explanation or justification for the proposed hierarchy.

The SA discusses the topic briefly and refers to the 'Growth Options Document', which formed part of the R18A consultation in 2018. The Growth Options Document¹ states:

"The current levels in the hierarchy set out in the JCS [Joint Core Strategy], are "Norwich Urban Area", "Main Towns", "Key Service Centres" (KSCs), "Service Villages", "Other Villages" and "Smaller Rural Communities and the Countryside"

and:

"KSCs are...Acle, Blofield, Brundall, Hethersett, Hingham, Loddon / Chedgrave, Poringland / Framingham Earl, Reepham and Wroxham."

The top three tiers of the proposed hierarchy are taken directly from the JCS, without any amendment or re-consideration of material changes that have occurred over the decade since the JCS was prepared – for instance the completion and opening of the Norwich Northern Distributor Road, which have fundamentally changed the context of some settlements, such as Horsford, significantly improving access to social and economic infrastructure. Indeed, the only consideration at R18 stage was whether the lower levels of the hierarchy should be combined into 'village clusters'.

In summary, the hierarchy in the Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and as such the Plan has not been positively prepared, is not justified, and will not be effective.

¹ Paras. 4.4.3 and 4.4.6

[Matter 2 / Issue 2] Question 3. Are all of the settlements listed in the correct level within the hierarchy?

No.

Settlement Hierarchy & Horsford

The Plan (Table 1) sets out the largest settlements, by population according to the 2011 census, within the Greater Norwich area:

Settlement	Population
Norwich urban area	213,166
Wymondham	14,405
Diss	7,572
Aylsham	6,016
Hethersett	5,691
Poringland (including Framlingham Earl)	4,826
Harleston	4,641
Long Stratton	4,425
Horsford	4,163
Brundall	4,019
Blofield	3,316
Acle	2,824
Reepham	2,709
Hingham	2,367
Loddon and Chedgrave	2,284
Wroxham	1,502

The Plan then sets out² a 'settlement hierarchy':

1. The Norwich urban area
2. The main towns
3. The key service centres
4. Village clusters

Continued.../

² Para. 191 and Policy 1

Whilst noting that population alone is not necessarily a determiner as to what tier of the hierarchy a settlement should be placed within, when the hierarchy is applied to list of the largest settlements, it is generally that the larger a settlement the higher the tier it falls within:

Settlement	Population	Hierarchy Tier		
Norwich urban area	213,166	1		
Wymondham	14,405	2		
Diss	7,572	2		
Aylsham	6,016	2		
Hethersett	5,691		3	
Poringland (including Framlingham Earl)	4,826		3	
Harleston	4,641	2		
Long Stratton	4,425	2		
Horsford	4,163			4
Brundall	4,019		3	
Blofield	3,316		3	
Acle	2,824		3	
Reepham	2,709		3	
Hingham	2,367		3	
Loddon and Chedgrave	2,284		3	
Wroxham	1,502		3	

What is not clear is why Horsford – the ninth largest settlement, is the only settlement listed in Table 1 that is not within the top three tiers of the hierarchy.

Horsford has grown substantially over recent years, with the last decade of growth not being reflected in the above figures, and is continuing to grow. Combined, three planning permissions³ relating to the land adjacent and to the south of our clients' site⁴ have permitted a total of 429 new homes, with 235 homes completed by March 2021.

Together these new homes will increase the population of Horsford by approximately 1,000, likely elevating it yet further in the list of largest settlements as indicated below⁵, potentially to the sixth most populous settlement:

³ Refs: 2013/0547, 2016/1770 and 2019/0999

⁴ HELAA Ref. GNLP2160

⁵ Noting that growth in other areas would also need to be taken into account.

Greater Norwich Local Plan Examination

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Settlement	Population	Hierarchy Tier		
Norwich urban area	213,166	1		
Wymondham	14,405	2		
Diss	7,572	2		
Aylesham	6,016	2		
Hethersett	5,691		3	
Horsford	5,163			4
Poringland (including Framlingham Earl)	4,826		3	
Harleston	4,641	2		
Long Stratton	4,425	2		
Brundall	4,019		3	
Blofield	3,316		3	
Acle	2,824		3	
Reepham	2,709		3	
Hingham	2,367		3	
Loddon and Chedgrave	2,284		3	
Wroxham	1,502		3	

It is projected that delivery of the adjacent site will be complete by mid-2024, with an average of around 40 new homes per annum having been built and sold by then over the preceding decade (2013 – 2024).

The statement set out in paragraph 6.64 of the 'Sites Plan' that forms Part 2 of the Plan, that additional residential development in Horsford will be limited to only 20-50 new homes over the remaining 15-year period (i.e. 2023 to 2038) would appear at odds with the requirement in the NPPF that development plans be 'positively prepared', and a failure to continue with what has proved to be a very successful and consistent source of housing delivery.

Instead, a positive, justified and effective strategy would be to recognise and reflect the recent growth of Horsford. The lack of recognition of this growth is demonstrated in that the Plan does not even update the defined settlement boundary of Horsford to take account of the development granted permission over the past decade.

In planning for the next two decades, it would be wrong to fail to reflect this growth in population and plan properly for the needs of the growing community. Together with the recent and continued growth (the remaining permitted development is projected to be complete by mid-2024), additional housing growth could help support existing and new facilities and enable the village to become even more sustainable.

With respect to locational sustainability, Horsford is currently identified in the JCS as a Service Village, where there is a 'good level of services and facilities'. Moreover, the JCS identifies that Horsford is located within the Norwich Policy Area, where additional development might be considered acceptable.

This was most recently reflected in the grant of planning permission⁶ for 45 additional homes on land immediately adjacent to the promotion site, with the planning committee report⁷ concluding:

*"Notwithstanding there is no demonstrable deficit in the supply of housing land within the Greater Norwich Policy Area, it is considered that **Horsford is a sustainable location for additional residential development...**"*

This additional 45 homes increases the number of homes currently being built on the land adjacent to our client's site to 304.

Similar conclusions were reached in respect of the permission on a site to the south (ref. 2013/0547) for 125 dwellings, and in respect to the underlying permission (ref. 2016/1770) for 259 dwellings (committee report, para 9.44):

*"...Horsford is a sustainable location for new development **given the level of services which it offers...**"*

Within a few years, Horsford will have a population of around 5,000 or more (if it does not already). The Plan proposes that only a single site (ref. GNLP0264) be allocated for housing development, for 30-40 dws, which will provide new homes for only around 80 people. This will represent a growth rate over the latter 15 years of the plan period (2023-38) of just 1.6%, in the largest village cluster, that is acknowledged by the LPA to be a 'sustainable location for additional residential development'.

This is not a Plan that has been positively prepared.

The 'Sites Assessment Booklet' for Horsford states:

"It is considered that as well as existing commitments and windfall development, approximately 20-50 new homes are appropriate for the Horsford cluster. In addition to the primary school, services include a shop, doctor's surgery, village hall, library and public house."

The introduction to the Site Assessment Methodology⁸, states:

"The scale of growth proposed within each 'village cluster' reflects school capacity or ability or grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it has been assumed that a minimum scale of allocation (12- 20 dwellings) can be accommodated in all clusters if appropriate sites are available. To guide development all village clusters have been rated 'red' (12- 20 dwellings), 'amber' (20-50 dwellings) or 'green' (50-60 dwellings) based on information provided by Children's Services, although this is a

⁶ Ref. 2019/0999

⁷ Para. 5.11

⁸ Para. 1.5

starting point and there is flexibility within these ratings, depending upon the quality of sites and the circumstances of individual schools.”

As a methodology, this statement is distinctly insufficient and places undue and unjustified emphasis on unpublished advice from ‘Children’s Services’.

With the Booklet stating that:

“...it is considered that...approximately 20-50 new homes are appropriate’ for Horsford, it is assumed that the village has been rated ‘amber’ “based on information provided by Children’s Services”.

There is no other justification as to how the Councils have arrived at the figure of ‘20-50’ for Horsford.

The solution is straightforward: to recognise Horsford as the Key Service Centre that it truly is. It is one of the most populous settlements in the Greater Norwich area, it is barely a few kilometres from Norwich airport and various other employment areas, and **the R18A Growth Options document identified that the settlement possessed all core services and all secondary services** bar one – a Post Office; but there is indeed a Post Office in the centre of Horsford. In summary, Horsford should be reclassified as a KSC, and an appropriate and increased level of growth assigned to it.

In summary, the settlement hierarchy in the Plan is not based on an up-to-date assessment, fails to reflect current circumstances, and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

[Matter 2 / Issue 2] Question 4. Is the distribution of growth in line with the settlement hierarchy justified by the evidence?

Overall, the proposed distribution of growth, including the focus on the area around Norwich, is considered to be the most appropriate strategy, and is supported.

However, at a more detailed level the evidential basis for the selection of sites, and thus the distribution of growth across the settlement hierarchy / individual settlements is flawed (noting our response to Questions 2 and 3). The HELAA assessment is factually incorrect (and there is no evidence or justification for the non-allocation of our clients site).

The HELAA comprises three ‘volumes’:

- The December 2017 HELAA;
- The October 2018 HELAA Addendum I;
- The January 2020 HELAA Addendum II; and
- The December 2020 HELAA Addendum III.

The HELAA⁹ explains that it:

⁹ Para. 7.5 and the Addenda

“...presents [only] a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses.”

We submitted representations to both the 2018 R18B and 2020 R18C consultations. In 2018 we promoted our client’s site for up to 500 homes, whilst in 2020 this was reduced to up to 350 homes. Based on the information we provided in 2018, the site should have been reappraised but was not, instead it was erroneously stated that the site was being promoted for 600 homes – an error that the Councils acknowledged but have not corrected. Again, based on the further, more detailed, information that we provided in 2020, the site should again have been reappraised, but was not.

However, despite the HELAA explicitly recognising and stating that it only represents:

“...a snapshot of the position at a particular point in time and will need to be updated regularly as plan preparation progresses...”

the Councils have not sought to update any of the HELAA assessments carried out to date; in essence, the HELAA ignores all of the additional information submitted through previous consultations, at least on non-allocated sites.

By way of example, the HELAA still concludes that the two sites adjacent to our client’s – one which has been completed and one which is under construction, are ‘not considered to be suitable for allocation’ – the conclusions of the site assessments as contained in the HELAA clearly cannot be relied upon as accurate.

Instead, the submitted Site Assessment Booklet for Horsford¹⁰ undertakes no re-assessment of our client’s site, continues to refer to 600 homes, and casts aspersions on its suitability based on unevidenced and incorrect assertions. This error is pertinent in that, despite the flawed technical assessment, the Booklet identifies¹¹ the site as a ‘reasonable alternative’ that is:

“... better located to the services in the village (and most particularly the school) when compared to the other large-scale sites in Horsford.”

This becomes particularly pertinent in that the Booklet¹² then explains:

“This site is not considered to be reasonable for allocation as the scale of the proposal is a concern...”

In short, the HELAA has dismissed the potential for a higher level of growth at Horsford by incorrectly appraising our client’s site; the HELAA assessment is thus flawed and factually incorrect.

In summary, the limited amount of growth assigned to Horsford, which despite being a village cluster, is the ninth most populous settlement, and recognised as a sustainable location for additional residential development, is not supported. A positive, justified and effective strategy would be to recognise and reflect the recent growth of Horsford and to provide for further growth to yet further improve its sustainability. As

¹⁰ Document B1.39

¹¹ See p. 14

¹² See p. 40

such, the Plan is not sound as it has not been positively prepared, is not justified, will not be effective and is not consistent with national policy.

Issue 4 – Village Clusters

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

No.

In our response to Matter 2, Issue 2, Questions 2, 3 and 4 (see above), we explain that the settlement hierarchy in the draft Plan is not based on an up-to-date assessment and, as such, the Plan has not been positively prepared, is not justified, and will not be effective. The evidence suggests that Horsford should be reclassified as a Key Service Centre, and an appropriate and increased level of growth assigned to it. As it stands, the Plan is not justified, will not be effective, and is not consistent with national policy.

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