

Greater Norwich Growth Board
c/o Norfolk County Council
County Hall
Martineau Lane
Norwich
NR1 2DH

Sent by Email – gnlp@norfolk.gov.uk

31465/A3/LJ

11 March 2020

Dear Sir/Madam,

**REPRESENTATIONS TO THE GREATER NORWICH LOCAL PLAN DRAFT STRATEGY
REGULATION 18 CONSULTATION, MARCH 2020**

These representations are made on behalf of KCS Developments in respect of the Greater Norwich Local Plan to 2036. The consultation proposes a broad locational strategy for sites and contains thematic strategic policies. With the exception of sites in smaller villages in South Norfolk, the document details the proposed sites for growth.

Sites within smaller villages in South Norfolk will be allocated through a separate village clusters plan covering sites for small-scale housing, which is due to be progressed shortly.

These representations focus upon the following matters:

- The vision and objectives for Greater Norwich;
- The proposed settlement hierarchy and distribution of housing within the hierarchy; and
- Village Clusters.

Our Client is promoting five sites within Spooner Row which can deliver between 173 and 246 dwellings along with community facilities. Spooner Row is proposed to fall within the lowest tier of the settlement hierarchy within the GNLP – the “village clusters” – despite previously being identified as a service village within the Core Strategy. These representations demonstrate that this approach is flawed and underplays the significance of settlements such as Spooner Row.

1. Consultation Questions for Section 3 – The Vision and Objectives for Greater Norwich

Question 6: Do you support or object to the vision and objectives for Greater Norwich?

We do not object to the vision and objectives however the broad vision for Greater Norwich should also reference the need to accelerate the delivery of homes in accessible locations to support the target level of jobs growth in order to maintain and grow a robust, vibrant and diverse economy.



We support the approach within the vision of building most new homes in and around Norwich and in the Cambridge Norwich Tech Corridor, with the recognition that suburbs, towns and villages will be vibrant places to live with good access to services and facilities, supported by new housing and jobs. We suggest that there does however need to be more emphasis on delivering new housing within towns and villages to support this part of the vision. This needs to be followed through into the proposed hierarchy and distribution of new housing growth within the GNLP.

2. Consultation Questions for Policy 1 – The Sustainable Growth Strategy

Question 13. Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?

Settlement Hierarchy

The GNLP advises that settlements within the bottom three tiers of the current framework would be merged into a single lowest tier of "Village Clusters" within a settlement hierarchy of just four tiers. This would serve to underplay the significance of Spooner Row as a service centre in terms of its scale, function and facilities as well as its capacity to accommodate future growth within the Cambridge to Norwich Growth Tech Corridor. This approach is flawed.

The grouping together of "Service Villages", "Other Villages" and "Smaller Rural Communities and the Countryside" into a single lowest tier within a settlement hierarchy comprising just four rather than six tiers as is currently the case would significantly undermine the function and role that Service Villages can play in accommodating future growth.

Service Villages such as Spooner Row include a range of functions and services which are more closely aligned to the functions and service characteristics of Service Centres than they are to Other Villages which are defined by their offer of just a very basic, narrow range of services. Service Villages such as Spooner Row are much more sustainable settlements capable of accommodating much higher housing growth than Other Villages and Smaller Rural Communities and the Countryside. Spooner Row benefits from a range of local services such as primary school, village hall, church and a public house. Development of the settlement presents the opportunity to enhance these facilities and also provide a village shop. Spooner Row benefits from being well connected due to its situation along the A11 corridor and benefits from a railway station with services to Norwich and Cambridge which is key to its future growth.

If the settlement hierarchy is to continue to be rationalised into four tiers, we would recommend that Service Centres and Service Villages should be combined into a single 3rd tier and Other Villages combined with Smaller Rural Communities and the Countryside to form a 4th tier.

Proposed Distribution of Housing

In terms of the proposed distribution of housing within the hierarchy, the preferred option selected by the Council combines concentrating most of the development in and around Norwich and on the Cambridge Norwich Tech Corridor, with an element of dispersal to villages to support thriving rural communities.

Our Client supports this approach in principle as it would serve to ensure that there is a focus for delivering development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor, plus locating growth near to jobs and infrastructure. The merging of a number of tiers within the Settlement Hierarchy however does not support this proposed distribution of growth, with Service Villages potentially missing out on growth by being categorised within Village Clusters even if they are situated within the Tech Corridor.

The GNLP proposes to allocate and permit housing growth of 4,024 homes within village clusters. This accounts for circa 9% of the total for Greater Norwich in the plan period. As discussed above, village clusters comprise of settlements which are currently categorised as service villages, other villages, smaller rural communities and the countryside. This accounts for a large proportion of settlements within Greater Norwich. The Core Strategy identifies 61 service villages and 39 other villages. The distribution of 4,024 homes across these settlements would result in a very low level of growth within each (circa 42 within each over the Plan Period) which is not likely to support their continued sustainability or viability.

There are clear differences between settlements within the village clusters and if the proposed hierarchy is to be adopted there needs to be clear recognition that larger villages such as Spooner Row should accommodate more growth than smaller villages which were previously lower in the settlement hierarchy.

Spooner Row is situated along the A11 corridor within the Cambridge to Norwich Tech Corridor. As well as being situated along the A11 corridor it also benefits from a railway station which is key to the settlement's future growth. The proposed distribution of growth would result in this highly sustainable settlement which has the capacity to accommodate a generous amount of growth missing out on growth and the potential to improve its local services.

The distribution of growth should explicitly support more growth in certain service villages such as Spooner Row and more limited growth in other villages and smaller rural communities to reflect their sustainability and potential for additional growth.

3. Consultation Questions for Policy 7.4 – The Village Clusters

Question 45. Do you support or wish to comment on the overall approach for the village clusters? Please identify particular issues.

Question 46. Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.

Our Client does not support the overall approach to village clusters. Firstly, our Client objects to the grouping together of several settlement sizes into one level within the hierarchy for the reasons discussed earlier within these representations. There are clear differences between settlements within the village clusters and if the proposed hierarchy is to be adopted there needs to be clear recognition that larger villages such as Spooner Row should accommodate more growth than smaller villages which were previously lower in the settlement hierarchy.

Secondly, our Client has concerns regarding the note within Policy 7.4 which states that sites between half a hectare and 1 hectare will be "particularly welcomed". Sites of this size are likely to be more appropriate within other villages or smaller rural communities however there is no recognition that settlements which are currently categorised as service villages could accommodate a greater level of housing growth.

For instance, Spooner Row benefits from being served by a railway station, a primary school, village hall, church and a public house. The settlement currently lacks any shop however development of our Client's sites can help to facilitate this. Within the adopted Core Strategy Spooner Row is specifically identified as a settlement which may be considered for additional development however the settlement is effectively downgraded within the GNLP by including it within the broad category of "village clusters".

Please submit any additional sites in village clusters in either Broadland or South Norfolk which you feel are suitable for allocation. We are particularly looking for sites of less than 1 hectare which could provide a minimum of 12 homes.

Our Client is promoting five parcels of land at Spooner Row with an overall aggregate site area of 19.5ha with a capacity of 173 to 246 dwellings.

A Vision Document has been submitted with these representations which was prepared in 2016. This provides an overview of the opportunities that the development can bring and includes an initial concept masterplan to show how the sites could come forward. Our Client is committed to bringing the sites forward in an effective and iterative manner to benefit the entire community. The final masterplan will be a result of an interactive process with the community.

It is our Client's intention to deliver on a phased masterplan following the consultation process which will deliver housing required to enable the village to remaining sustainable and to deliver local services that residents wish to see. This fully supports the Council's proposed vision within the GNLP which is for suburbs, towns and villages to be vibrant places to live with good access to services and facilities.

The sites which are being promoted are set out in more detail below.

The Sites

Site 1

Site 1 is located to the east side of the railway line on the west side of Bunwell Road and extends to 3.64ha. It is bound by residential development to the north, a field hedgerow and mature tree boundary to the west and a partial hedgerow field boundary to the east facing onto housing along the east side of Bunwell Road. The site is well related to the existing settlement within easy walking distance to local services. It will logically infill the gap which exists between linear settlement form along Queens Street and Bunwell Road.

The majority of the site falls within Flood Zone 1, with a small proportion to the north falling within Flood Zones 2 and 3. The land within Flood Zones 2 and 3 would not be developed however would form part of an integrated sustainable drainage scheme providing flood protection within and beyond the site.

Site 1 has the potential to deliver between 44 to 61 homes along with open space provision.

Site 2

Site 2 is located immediately to the east side of the railway line and on the south side of Station Road. It extends to 4.06ha and is well related to the existing settlement. The development of the site will logically infill a gap and consolidate the fractured settlement pattern, creating a more cohesive village morphology. The gap which exists between the east and west sides of the village is not special in terms of its landscape value and there are no proposals within the emerging Local Plan to preserve the existing settlement pattern due to heritage or special character.

Development of the site would include the addition of a footpath to the south side of Station Road to significantly improve access within the village and surveillance from houses fronting onto Station Road.

The majority of the site falls within Flood Zone 1, with a small proportion of the north-east corner of the site falling within Flood Zones 2 and 3. As with Site 1, the land within Flood Zones 2 and 3 will not be developed.

Site 2 has the potential to deliver between 39 to 54 homes along with open space and children's play facilities.

Site 3

Site 3 extends to 0.9ha and is located at the junction of Guiler's Lane and Chapel Road. The site is partially bound to the south by a short section of low hedgerow and mature trees with the remainder of the boundary being unenclosed.

The site is surrounded by the Grade II listed church and its grounds immediately to the west, low density residential development to the north and an enclosed field used as a sports pitch to the west. The site is well contained, and its immediate surroundings are characterised by low-density built-up development.

The site is not constrained by any landscape designations and development would not impact on any designated ecological areas.

The site is situated adjacent to two Grade II listed buildings and so the impact upon the setting of these assets would need to be considered. The situation of these assets near to the site would not however preclude development of the site.

Site 3 has the potential to deliver between 4 to 5 homes with provision for public open space and a car park to provide overspill parking for the public house and church. There is also the potential to incorporate a shop unit which is located very centrally for the majority of the village. As discussed above, these facilities would come forward following consultation with the local community to ensure that local facilities are being developed that residents want to see.

Site 4

Site 4 extends to 6.8ha and is bound to the west by the railway line with domestic gardens of houses situated along Chapel Road and Chapel Loke to the north-east. The grounds of the Grade II listed Holy Trinity Church is situated adjacent to the site's south-eastern boundary. It is well related to local village amenities.

The site is not affected by any landscape designations and development would not impact on any designated ecological areas. The majority of the site falls within Flood Zone 1. The southern section of the site falls within Flood Zones 2 and 3 however this area would not be developed. Instead, it would form part of an integrated sustainable drainage scheme and public open space.

Approximately 45% of the site is suitable for housing which could accommodate 59 to 88 homes, with the remainder of the land suitable for use as public open space, flood mitigation, the formation of new habitats and the provision of a car park to serve the railway station. The design of the open space to function as a landscaped village green would improve the amenity value of the village whilst maintaining a visual break between the settlement zones on each side of the railway line.

Site 5

Site 5 extends to 3.95ha and is proposed for housing and public open space, with the potential to accommodate future school expansion needs and the provision of allotments.

The site is accessible by foot to existing local services. It is bound by agricultural land to the west and the north and the A11 beyond. Spooner Row Primary School and its associated sports pitches along with housing are located to the south of the site, further residential development to the north west and low-density residential development to the east.

Whilst the site extends to 3.95ha the indicative masterplan proposes that circa 1.5ha would be developed for residential to ensure that the scale would not over-dominate the existing village.

Site 5 has the potential to deliver 27 to 38 homes. It is acknowledged that the adjacent primary school is over-subscribed in terms of pupil numbers and the development of the five sites could give rise to a need to provide additional classrooms and associated infrastructure. For this reason, land has been made available on this site to accommodate such provision. Depending on the needs of the local community, residual land could also be made available to provide allotments to serve the site and wider village.

Summary and Conclusions

Our Client objects to the proposed settlement hierarchy which seeks to group service villages, other villages and smaller rural communities and the countryside into a single tier referred to as village clusters.

The clustering together of these settlements downgrades the significance of service villages and their potential for growth. Certain service villages such as Spooner Row are more akin to service centres where services and public transport infrastructure exists than other villages and smaller rural communities and should be included as a separate tier within the settlement hierarchy. In the event that the Council continues to pursue village clusters then recognition should be made that certain settlements such as Spooner Row can accommodate more growth than other settlements within this tier.

Our Client's sites at Spooner Row are capable of accommodating further growth in a sustainable location which will deliver meaningful community benefits and improve the social cohesion of the village and should be allocated for residential development. Discussions with the village community will progress on this basis and fresh evidence will be provided to the Plan process as it arises.

Yours sincerely

LUCIE JOWETT

Senior Planner

Enc. Vision Document