

FAO: Greater Norwich Local Plan Team
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Norwich
NR7 7NX

BY EMAIL AND POST: gnlp@norfolk.gov.uk

26007/A3/RM/sl
13 March 2020

Dear Sir/Madam,

GREATER NORWICH LOCAL PLAN - STAGE C REGULATION 18 DRAFT STRATEGY AND SITE ALLOCATIONS

We write on behalf of Quantum Land (Brundall) Ltd in respect of both the above consultation documents. We have an interest in Land off of Links Avenue to the East of the Memorial Hall, Brundall. The site is capable of delivering 175 C3 dwellings and 10ha of formal and informal open space. The site is subject to an undetermined appeal and an officer recommendation to approve.

DRAFT LOCAL PLAN

We object to the spatial strategy for housing and the various linked policies associated with delivering that spatial strategy – Policy 1 and Policies 7.1-4. Our main objections are:

1. The lack of focus and housing allocations proposed for the “Key Service Centres” in comparison to lower settlement hierarchy tiers; and
2. The allocation of no housing growth to Brundall;

The settlement hierarchy is defined as:

1. Norwich Urban Area
2. Main Towns
3. Key Service Centres
4. Village Clusters

Of the 7,840 dwellings proposed for new allocations, they are distributed as follows:

- | | |
|------------------------|-------------------|
| 1. Norwich Urban Area | 56% (4,395 units) |
| 2. Main Towns | 16% (1,250 units) |
| 3. Key Service Centres | 7% (515 units) |



4. Village Clusters 21% (1,200 units)

Whilst the focus on the urban area of Norwich Urban Area is appropriate, we consider that the balance across the settlement hierarchy is not optimal or justified. The “Main Towns” and “Key Service Centres” have individually less housing directed to them than the bottom of the settlement hierarchy, the “village clusters”, which has more dwellings. In fact, the second and third tiers of the settlement hierarchy have almost the same number in totality as the bottom tier. This seems unjustified given that they are the least sustainable locations for growth.

This is illustrated in that of the 9 key Service Centres only 4 have any new dwellings proposed and 1 of those 3 have only 15 units. Brundall has no housing allocated to it all despite being one of the closest and well-connected settlements to Norwich.

It is acknowledged that in both the Main Towns and Key Service Centres there are many “reasonable alternatives” that exist and so under alternative spatial approaches, a different spatial pattern could be achieved more sustainably. This is acknowledged in the consultation questions asked which notes:

“The 8% proportion of new housing in key service centres could be increased as many reasonable alternative sites have been proposed in key service centres. However, overall the preferred option is considered to provide a suitable amount of growth in relation to the settlement hierarchy, infrastructure and local constraints. The Sites document sets out the preferred option and reasonable alternative sites.”

We consider the spatial distribution should be reconsidered.

DRAFT SITE PLANS

In the “site assessment booklet for Brundall”, site GNLP0436 is land to the east of Links Avenue and the Memorial Hall. This site is subject to an on-going appeal. The site was recommended for approval by planning officers (July 2019). The committee report notes that no technical objections were received and Norfolk County Council and Highways England raised no objection to the scheme. No heritage or landscape concerns were identified. It was noted that significant benefit would be derived from the scheme for green infrastructure, including formal and informal open space, and habitat creation and enhancement of biodiversity. Planning committee refused the application, principle on the basis of a lack of need for additional housing, since they considered they could show a 5YHL supply. The appeal will be heard in April 2020 and a decision is expected by the end of June 2020.

It is noted that the assessment booklet confirms, under Stage 5, that the site is a “reasonable alternative” for “up to 250 dwellings, open space, recreation and leisure uses”.

Under Stage 6, “Detailed assessments of reasonable alternatives”, it is noted that the application is (it has now been) to go to planning committee with a likely recommendation to approve.

Under Stage 7, it is said:

“After further consideration, there are no sites preferred for allocation in the Brundall cluster. There remain high levels of existing commitments which are as yet undeveloped,

and it has not been possible to find ways to overcome infrastructure constraints, including access to the A47. These constraints are considered to limit the potential for additional housing at this stage, meaning there are no reasonable alternative sites either."

Clearly this is not the case in respect of Brundall. Site GNLPO436 is technically acceptable.

CONCLUSION

We object to the emerging Local Plan on the grounds that the spatial strategy is not reasonable, since it does not reflect the sustainability credentials of the settlement hierarchy by not allocating sufficient dwellings to Main Town Centres and Key Service Centres. There is too much growth focused on inferior village cluster settlements.

We object to the emerging Site Plans because no sites are allocated to Brundall and site GNLPO436 is not allocated.

We consider that less housing should be allocated to village clusters and Brundall should have housing allocations proposed for it. This should include a new allocation of 175 dwellings and associated open space with the inclusion of site GNLPO436.

Yours Faithfully,

ROBIN MEAKINS

Senior Planning Partner