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Working locally and nationally to promote, protect and enhance a beautiful and thriving countryside for everyone's benefit.

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### **South Norfolk Village Clusters Housing Allocations Plan (SNVCHAP) Regulation 18 Consultation Response**

CPRE Norfolk considers the Village Cluster approach to housing distribution proposed for inclusion in the GNLP to be neither necessary nor desirable. It is unnecessary because the housing need requirement, together with a reasonable buffer (5%), can be met without the need to disperse development in this way. It is undesirable because the additional dispersal of housing that will be generated via village clusters will cause an unnecessary loss of countryside and be more environmentally damaging than an approach in which development is concentrated in and near to Norwich.

The draft GNLP stresses the need for 'good access to services and facilities' for 'our suburbs, towns and villages'. While this is provided in settlements at and near the top of the settlement hierarchy, there is insufficient provision or access to services in many of the settlements within the "village clusters", in particular from many of the preferred sites for new housing. The decision to allocate additional new housing beyond what is already allocated within the JCS is largely based on the existence of a primary school with available places or potential for expansion within the "cluster", although it is noted that for some clusters this is not the case with schools at or near capacity. This does not amount to the provision of 'good access to services and facilities' and therefore this level of new housing in "village clusters" should not be permitted within the GNLP. Moreover, in several cases the nearest primary school to a preferred site for new housing is not within safe walking distance of that site, e.g. site SN4069SL in Brockdish is located 6km from the nearest primary school.

Clearly, there will be a major need for journeys from and to work for many of those living in any new housing, in addition to additional journeys by delivery vehicles to this new housing. The draft GNLP states the need for 'a radical shift away from the use of the private car, with many people walking, cycling or using clean public transport.' For the majority of the plan period it is highly wishful thinking to think that 'electric vehicles will predominate throughout Greater Norwich'. These additional journeys will not only add to the "carbon footprint" but will also add to congestion on the road network, affecting air quality and the wellbeing of residents. If the intention of the GNLP and SNVCHAP is to locate housing close to jobs, which we agree should be a major aim, then any additional allocations of housing should be located in or close to Norwich or major towns, where there are realistic opportunities to walk or cycle to work and to services, or to use public transport to do so. The existing allocations of housing within the JCS and to be carried forward to the GNLP will provide sufficient new accommodation close to other places of work.

It is extremely disappointing that the GNLP and South Norfolk authorities have not carried out thorough research to determine what are the implications for carbon emissions (and other impacts on Climate Change) from the proposed housing options. A good example of such research is that for the Greater Cambridge Local Plan, by Bioregional, on behalf of Greater Cambridge Shared Planning Authority (19 November 2020.) A link to that paper is here: <https://www.greatercambridgeplanning.org/media/1421/gclp-strategic-spatial-options-assessment-implications-for-carbon-emissions-nov2020.pdf> Figure 3 of this paper clearly shows the high level of emissions due to private cars in more rural areas. Initial steps in this direction by the GNLP authorities as described below (GNLP Board Papers, 23 June 2017) appear to have been subsequently ignored.

CPRE Norfolk supports the continuation of the settlement hierarchy as defined in the JCS. We wonder why the concept of "village clusters" has been introduced into the planning process. For many reasons they appear to be a flawed and unsustainable concept. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and

therefore we are very disappointed that this distinction has been abolished. The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach.

In addition, we strongly object to the use of the open-ended statement that these South Norfolk “village clusters” will be allocated a ‘minimum’ of 1,200 houses, rather than giving a maximum number as is the case for the Broadland “village clusters”. If the reason for this separation is, as was given at the GNDP meeting of 6<sup>th</sup> January 2020, the lack of suitable sites coming forward in these South Norfolk “village clusters”, then this gives another good reason why the delivery of housing should be phased. Clearly the sites included in the JCS have undergone rigorous assessment and their inclusion in the Local Plan is an acknowledgement of their suitability for development. It makes absolute sense that these suitable sites should be developed first.

The draft GNLP’s strategy for location of growth ‘focusses reasonable levels of growth in the main towns, key service centres and village clusters to support a vibrant rural economy’, before suggesting that the approach to “village clusters” is ‘innovative’. The claim that providing new housing in such locations will support services is, we contend, largely illusory. Instead, additional new housing will lead to more car and delivery vehicle journeys, with residents travelling longer journeys to access the services they require such as health services and a supermarket. Given that the majority of any such new houses will be larger “family” homes, with children just or more likely to be of secondary or tertiary school or college age than of primary school age. This will have further negative impacts on carbon reduction due to the additional journeys needed to secondary schools or colleges.

It is clearly demonstrated in the table on page 80 of the 23 June 2017 GNDP Board Papers that the most reasonable option for the distribution of housing in terms of the environment (e.g. minimising air, noise and light pollution; improving well-being; reducing CO<sub>2</sub> emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; promoting the efficient use of land; respecting the variety of landscape types in the area; ensuring that everyone has good quality housing of the right size; maintaining and improving the quality of life; reducing deprivation; promoting access to health facilities and healthy lifestyles; reducing crime and the fear of crime; promoting access to education and skills; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes; conserving and enhancing the historic environment and heritage assets; minimising waste generation; promoting recycling; minimising the use of the best agricultural land; maintaining and enhancing water quality and its efficient use) is Option 1: urban concentration close to Norwich. In terms of all these factors taken together the least desirable option as shown on this chart is Option 4: dispersal. We therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.

We cannot understand why the table showing the same set of factors in the Interim Sustainability Appraisal for the GNLP on page 42 shows some different results from the table on page 80 of the 23 June 2017 GNDP Board Papers. While the most recent table confirms that overall urban concentration is a better option than dispersal, it is even clearer in the earlier version. The table on page 42 shows that urban concentration is better than dispersal in terms of: minimising air, noise and light pollution; improving well-being; reducing CO<sub>2</sub> emissions; mitigating the effects of climate change; protecting and enhancing biodiversity and green infrastructure; encouraging economic development covering a range of sectors and skill levels to improve employment opportunities for residents and maintaining and enhancing town centres; reducing the need to travel and promoting the use of sustainable transport modes. However, in terms of some of the other factors it seems that changes have been made to the table so that several options appear to be equal in terms of impacts, instead of showing what the earlier table demonstrated, which is that concentration was the best option and dispersal the least reasonable option.

Given the clear benefits and advantages from these documents for the environment, climate change and other areas, as well as other reservations around lack of sustainability and issues of delivery, we strongly urge the removal of the requirement for additional new sites for housing in the “village clusters” from the GNLP, and for the withdrawal of the SNVCHAP.

### **The GNLP and South Norfolk Village Clusters**

CPRE Norfolk challenges the decoupling of the housing allocations for the South Norfolk Village Clusters and its associated policy from the rest of the GNLP as being unsound. The GNLP Regulation 19 consultation commenced before

the South Norfolk Village Clusters Housing Allocations plan (SNVCHAP) had been published for its Regulation 18 consultation. This is despite the South Norfolk Local Development Scheme (accessed 24 June 2021 when it was labelled as “final”) stating that the SNVCHA will be consulted on in February/March 2021. While it is reasonable for a Local Plan to comprise several separate documents, for the GNLP and the SNVCHAP to be sound they should follow the same, or at least a very similar timetable, otherwise it is impossible to judge whether the two (or more) documents are based on proportionate evidence. This clear link is demonstrated by the GNLP setting the overall numbers of new houses to be included in the SNVCHAP, and by the GNLP meeting of 10 July 2020 noting that the GNLP would ‘consider whether the “minimum” reference can be amended in the Reg. 19 version of the GNLP as the SNVCHAP progresses’ (page 20, GNLP papers, 10 July 2020.) By including the “minimum” term at various points in the current SNVCHAP Reg. 18 consultation documentation, it is possible that the SNVCHAP could include new housing allocations of a far greater number than 1,200, as that would still fall within the definition of a “minimum” number. This potential change in housing numbers within the GNLP would further increase the housing numbers beyond an already inflated number. We note that the Reg. 19 GNLP Table 6 states there will be 1,200 houses in the SNVCHAP not a “minimum” of 1,200.

It is also worth commenting on South Norfolk District Council’s Statement of Community Involvement (amended version September 2020, accessed on 24 June 2021) which is out of date. Here, the emerging Local Plan is described as the GNLP (para. 39) with no reference to the SNVCHAP, which is misleading and inaccurate. Also, the GNLP is described as covering the period to 2036 (para. 41), whereas it should be until 2038.

## **The Plan Objectives.**

**Question 1: Do you agree with the Objectives for the Village Clusters Plan? If you think the Objectives should be changed, please explain how and why.**

SNVC Objective 1 – Meet housing needs.

Housing need for Greater Norwich is 40,541 with a necessary buffer of 5%, giving a total of 42,568. The GNLP’s figure of 49,492 new dwellings to 2038 including a buffer of 22% is therefore unnecessarily, unsustainably and irresponsibly high, particularly given the need to address Climate Change commitments and targets. In addition, the GNLP only includes 1,296 dwellings estimated to be provided through “windfalls” during the plan period, despite the GNLP forecast that this number will in fact be 4,450 stating that ‘windfall delivery is likely to remain robustly high.’ This means that there is no need to have any new sites for housing allocated in the SNVCHAP, particularly given the existence of existing allocated sites in many of these settlements in the JCS.

SNVC Objective 2 – Protecting village communities and support rural services and facilities.

There is very little economic evidence to suggest that cementing new housing estates on the edges of villages will bring any boost to local services, but rather they will put a strain on these services, where they exist. Instead, additional new housing will lead to more car and delivery vehicle journeys, with residents travelling longer journeys to access the services they require such as health services and a supermarket. Given that the majority of any such new houses will be larger “family” homes, with children just or more likely to be of secondary or tertiary school or college age than of primary school age. This will have further negative impacts on carbon reduction due to the additional journeys needed to secondary schools or colleges. Now that the draft SNVCHAP has been published it is clear that not all of the proposed sites for new housing have the promised ‘good access to services’.

SNVC Objective 3 – Protect the character of villages and their settings

The best way to ensure this is fulfilled would be not to have any new allocations for housing in these settlements, other than for windfalls and for those sites already allocated through the JCS. Most of the new preferred sites are on the edges of existing settlements, often on land currently designated as countryside, while the scale of some is out of proportion to the settlements they’re being bolted on to.

### **Policy SNVC1 – Standard requirements**

**Question 2: Do you agree that the Village Clusters Plan should include a policy on ‘Standard requirements’? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?**

CPRE Norfolk does not agree there is a need for a Village Clusters Plan for the reasons stated above. If, despite this, the Village Clusters Plan goes ahead it should include the suggested criteria. In addition, reference to adopted Neighbourhood Plans and Conservation Areas should be explicit, along with the need for supporting surveys and studies to be clarified. These should include a heritage assessment in line with NPPF para. 189 when any heritage asset, including the contribution made by their setting, could be affected by development.

### **Policy SNVC2 – Design**

**Question 3: Do you agree that the Village Clusters Plan should include a policy on ‘Design’? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?**

CPRE Norfolk does not agree there is a need for a Village Clusters Plan for the reasons stated above. If, despite this, the Village Clusters Plan goes ahead a Design Policy should include the stated points, and also include further requirements to meet the highest possible standards of design to help address Climate Change.

### **Policy SNVC3 – Housing Mix**

**Question 4: Do you agree that the Village Clusters Plan should include a policy on ‘Housing Mix’? If so, do you agree that the criteria suggested are appropriate, or should they be amended and/or should additional criteria be added?**

CPRE Norfolk does not agree there is a need for a Village Clusters Plan for the reasons stated above. If, despite this, the Village Clusters Plan goes ahead it should only allocate new sites for housing which meet a clearly demonstrable need. This need is highly unlikely to be for large ‘executive-style’ houses which have tended to proliferate in small housing developments across South Norfolk villages in recent years: these houses should not be part of the SNVCHAP. Instead, mechanisms should be in place to ensure that needed affordable housing in particular is provided.

This does not mean that CPRE Norfolk is opposed to the "organic" growth of villages. We consider that a combination of Windfall development (projected as likely to result in 4,450 extra dwellings over the plan period) plus the build-out of existing JCS commitments and a more extensive use of rural exception sites for social housing (when requested by Parish Councils and developed in conjunction with housing associations) is the right way to provide the right level and type of growth that villages need to grow. The cementing of new housing estates on to villages as a result of a village cluster approach is not organic development.

**David Hook, Trustee, CPRE Norfolk**

**Michael Rayner, Planning Campaigns Consultant, CPRE Norfolk**