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**By email only**

Dear Sir or Madam,

**Greater Norwich Local Plan (GNLP): The Growth Options consultation (Regulation 18)**

Savills UK Ltd, (Rural, Energy & Projects) is instructed by our client, J Fenwick Esq, to submit a representation in response to the Greater Norwich Local Plan (GNLP) Consultation.

**National Planning Policy Context**

The National Planning Policy Framework (NPPF) establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 14 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.

Paragraph 55 of the NPPF outlines that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use, as required by Section 3 of the NPPF: Supporting a Prosperous Rural Economy.

It is therefore important that the emerging Local Plan pursues a development strategy that allows for the growth of villages, alongside the larger urban areas as a means of ensuring their long term sustainability. An approach to growth which allows for organic and sympathetic development at an appropriate scale is vital.

**Greater Norwich Local Plan (GNLP): The Growth Options consultation (Regulation 18)**

The following section provides our Client's response to the Local Plan Consultation. The responses are set out in accordance with the Greater Norwich Development Partnership's (GNDP) questions within the document.

**1. Do you agree with the draft vision and objectives for the plan below? (page 17)**

Yes.

**Comment:** In principle our client supports reference to ‘growing vibrant, healthy communities’. However, any vision and objectives should be mindful of the importance of ensuring a ‘thriving’ rural community, a core principle of the NPPF and one reaffirmed in the recently published consultation on changes to the National Planning Policy Framework (March 2018). Paragraph 80 of this consultation document notes:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services.”*

**2. Do you support the broad strategic approach to delivering jobs, homes and infrastructure set out in paragraphs 4.1 to 4.7? (page 20)**

Yes.

**Comment:** The broad strategic approach to delivering jobs, homes and infrastructure is supported in principle. However, as previously noted in relation to question 1, any strategy for the Greater Norwich Growth Area should recognise the contribution that the Small Rural Settlements and Villages can make to delivering a sustainable long term strategy for development. Any strategy should be mindful of the importance of ensuring a ‘thriving’ rural community, a core principle of the NPPF and one reaffirmed in the recently published consultation on changes to the National Planning Policy Framework (March 2018).

**9. Which alternative or alternatives do you favour?**

Option 6 - Dispersal plus Urban Growth.

**Comment:** Paragraph 55 of the NPPF outlines that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use, as required by Section 3 of the NPPF: Supporting a Prosperous Rural Economy.

The Housing White Paper, ‘Fixing our broken housing market’, published in February 2017 highlights the importance of encouraging growth in settlements within rural areas, and specifically referenced it as a means of increasing housing supply.

This approach is continued within the current consultation on amendments to the NPPF, which notes in Paragraph 80:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services.”*

The approach of Option 6 is considered to align closely with the guidance of the NPPF, allowing for the growth of villages, alongside the larger urban areas as a means of ensuring long term sustainability across the settlement hierarchy. It is vital that any growth strategy for the Greater Norwich Growth Area recognises the contribution that the Small Rural Settlements and Villages can make to delivering a sustainable long term

strategy for development. Rural growth is necessary to maintain the quality of life of those living in all parts of the Greater Norwich Area, allowing for all communities to thrive.

**23. Do you favour option SH1, and are the villages shown in appendix 3 correctly placed?**

*“Have a 6 tiered hierarchy - This would broadly be a continuation of the current approach, with some changes in the detail for tiers 4 to 6. The amount of growth that would take place in the different tiers of the hierarchy would be dependent on the scale and range of services.”*

No.

**Comment:** The approach of SH1 does not adequately address the realities of rural communities. Village groups form around the nearest facilities, and within these groups services are shared. Appropriate regard should be given to smaller villages and hamlets where services such as village pubs and primary schools are struggling. The draft NPPF recognises this, noting in Paragraph 80 of the draft consultation document:

*“Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

Equally, National Planning Practice Guidance (NPPG) notes that all settlements can play a role in delivering sustainable development in rural areas and as such blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided <sup>1</sup>.

**24. Do you favour the Village Group approach in option SH2? And**

*“Have a 4 tiered hierarchy including Village Groups as tier 4 - This would be a new approach. While tiers 1 to 3 would be the same as Option SH1, all remaining parishes below tier 3 would be amalgamated into Village Groups.”*

Yes.

**Comment:** Option SH2 is supported as a sustainable and appropriate strategy for the growth of the Greater Norwich Growth Area. This option recognises the realities of rural communities noting ‘*Village Groups are based on the premise that neighbouring villages share services*’. This option is also consistent with the draft NPPF, Paragraph 80 noting:

*“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should 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.”*

Encouraging growth in settlements within rural areas is considered to be in accordance with the NPPF, and was specifically referenced as a means of increasing housing supply within the Housing White Paper, February 2017. This approach is continued within the current consultation on amendments to the NPPF.

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<sup>1</sup> Paragraph: 001 Reference ID: 50-001-20160519

Equally, NPPG notes that all settlements can play a role in delivering sustainable development in rural areas, and as such blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided<sup>2</sup>.

Therefore, this approach which considers the inter-relationship of settlements is considered as a better means of supporting rural sustainability, recognising that growth in one location can bring wider reaching benefits to the wider local area.

**a) What criteria should be used to define groups?**

**Comment:** It is important that the definition of groups is informed by research and understanding of how settlements function and where relationships exist. Whilst appropriate criteria might include, distance to nearest facilities, Service Village, Service Centre or Main Town. Village groups form around the nearest facilities, and within these groups services are shared. The draft NPPF recognises this, noting in Paragraph 80:

*“Where there are groups of smaller settlements, development in one village may support services in a village nearby.*

However, there may be other factors in place which could be less tangible, relating to road networks or public transport provision.

**b) Which specific villages could form groups?**

**Comment:** This is an exercise which should be supported by further research undertaken by GNDP, however examples might include:

- Ditchingham, Broome, Kirby Cane, Kirby Row, Ellingham, Gelldeson, Thwaite

**c) How could growth be allocated between villages within a group?**

**Comment:** Our client considers that any growth strategy should recognise the contribution that all settlements can make to delivering a sustainable long term strategy for development. As part of any research to underpin the implementation of SH2, the functionality within each grouping should be examined. In addition, it is important that the growth strategy recognises that housing development in a village will have benefits which extend beyond the immediate locality, impacting on services and facilities in other settlements. .

Encouraging growth in settlements within rural areas is in accordance with the NPPF, and was specifically referenced as a means of increasing housing supply within the Housing White Paper (February 2017) and draft NPPF (March 2018). The revisions recognise the importance of smaller sites and the contribution to boosting the delivery of new homes they can have.

**33. What measures could the GNLPP introduce to boost the rural economy?**

**Comment:** The Government is committed to boosting the delivery of new homes on smaller and medium sized sites which can be delivered quickly and make an important contribution to the overall supply of new homes.

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<sup>2</sup> Paragraph: 001 Reference ID: 50-001-20160519

The Housing White Paper, February 2017, details the Government's commitment to amend national policy as follows:

- *“to expect local planning authorities to have policies that support the development of small ‘windfall sites’;*
- *indicate that great weight should be given to using small undeveloped sites within settlements for homes, where they are suitable for residential development.”<sup>3</sup>*

In addition, the Housing White Paper confirms that Local Planning Authorities should be allocating sufficient sites for residential development in Local Plans on small sites which are identified as: *“capable of accommodating fewer than 10 units or which are smaller than 0.5ha”* and in rural villages.

This aim has been reaffirmed within the revised NPPF (Paragraph 69), which seeks to require that at least 20% of sites identified for new housing in Local Plans are on sites of half a hectare or less, in addition to a requirement supporting the development of windfall sites. Similarly, the draft NPPF introduces specific support for proposals to sub-divide existing residential properties in the open countryside.

Softening the policy restrictions that are preventing residential growth in rural settlements would support the wider rural communities and the economy's there within, and align with national policy direction.

Furthermore, the draft revisions to the NPPF (Paragraph 85) introduces a recognition that in some instances it will be necessary to allow new business premises in the open countryside and in locations that may not be well served by public transport. This new policy approach should be echoed by any growth strategy with a more flexible approach to considering the locational requirements of rural businesses taken.

### **35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?**

**Comment:** Residential growth in rural settlements could increase demand for sustainable modes of transport such as buses, and so sustain and improve opportunities for existing and future residents. It would further encourage utility providers to update and improve infrastructure such as broadband and mobile networks.

### **37. Which approach to affordable housing thresholds do you prefer?**

*“Option AH2 - A proportion of affordable housing would be sought on all sites of 11 or more dwellings (or 0.5 hectares or more).”*

**Comment:** Current Government guidance suggests that local planning authorities should not require affordable housing to be delivered on development sites of 10 homes or less or 5 homes or less in designated rural areas. The aim being to encourage the delivery of new homes in rural areas on small sites where financial viability can be more marginal. Currently this set out within National Planning Policy Guidance, however, the draft NPPF (Paragraph 66) seeks to embed this guidance within the NPPF itself. Option AH2 aligns with this direction and would help to boost the delivery of new homes on smaller rural sites.

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<sup>3</sup> Paragraph 1.30, Housing White Paper, February 2017

Similarly, the draft NPPF restates the Government's support for delivering affordable homes at smaller settlements on 'rural exception sites' (sites which would not otherwise be considered appropriate for development). To make such schemes financially viable the draft NPPF retains a requirement for local planning authorities to consider allowing an element of open market housing on such sites as a means of cross subsidising affordable housing provision. Introducing such a provision would help to ensure the viability of schemes in rural areas, where entirely affordable development would be more difficult. Paragraph 79 notes:

*"In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this."*

The draft NPPF (Paragraph 65) also introduces the concept of 'entry level exception sites' adjacent to existing settlements which will be aimed at meeting the needs of first time buyers and those looking to rent their first home (i.e. homes for discounted sale or affordable rent).

#### **40. Which approach do you think should be taken to rural windfall and exceptions sites?**

*"Option AH7: Allow "small sites windfalls" to be permitted adjacent to development boundaries (i.e. sites of 10 or fewer to also include garden plots), subject to them meeting certain criteria (such as acceptable landscape impact, highways impact, access to services etc.) in all settlements with a development boundary."*

**Comment:** In principle our client supports Option AH7, however whilst settlement limits are a useful tool, a more flexible approach to development on the edge of settlements would ensure that appropriate development can come forward throughout the Plan period.

Proposals that are on land which is well-related to the built-up area should be supported on suitable sites, in accordance with the overall growth strategy. Similarly, housing in appropriate groups in the 'countryside' should be supported.

An approach such as this would enable a positive approach to growth in more rural settlements helping to secure their vitality, in accordance with Paragraph 55 of the NPPF. This approach is particularly helpful should more strategic sites stall, and so ensures sustainable sites can still come forward. It therefore incorporates a positive approach within the Local Plan to help boost significantly the supply of housing, as required by Paragraph 47 of the NPPF.

Equally, NPPG notes that all settlements can play a role in delivering sustainable development in rural areas, and as such blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided<sup>4</sup>.

The draft NPPF (Paragraph 69) introduces specific support for the development of windfall sites, noting:

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<sup>4</sup> Paragraph: 001 Reference ID: 50-001-20160519

*“To promote the development of a good mix of sites local planning authorities should, support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes”*

Whichever approach is pursued within the Local Plan, policy should enable development that is sustainable to come forward without delay, irrespective of its location in relation to settlement boundaries.

Section 3 of the NPPF ‘Supporting a prosperous rural economy’ recognises the importance of supporting economic growth within rural areas to create jobs and prosperity by taking a positive approach to sustainable new development for a range of uses and activities.

This foundation is built upon within the Housing White Paper, February 2017, which recognises the importance of allowing rural communities to grow and thrive. As noted in response to previous questions, the Housing White Paper builds upon the NPPF, explicitly identifying support for housing growth on ‘small sites’ in rural areas.

Therefore, it is vital that policy enables and supports these sites in a proactive way. Rather than focusing on settlement boundaries, an approach which ensures that sites that are suitable for development are supported for small housing schemes should be adopted.

#### **56. Should the GNLP protect additional Strategic Gaps and if so where should these be?**

**Comment:** The use of Strategic Gaps should only be used if supported by robust evidence base. Not simply to prevent development. This is consistent with National Planning Practice Guidance, which notes that all settlements can play a role in delivering sustainable development in rural areas, and as such blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided<sup>5</sup>.

#### **63. Do you support option BR1?**

*“Option BR1: Have a specific policy covering development proposals close to the Broads, requiring the special characteristics and nature of the Broads area to be taken into account.”*

Yes.

**Comment:** This option is consistent with the NPPF, namely Paragraphs 115 and 116 which recognise the importance of conserving landscape and scenic beauty in designated areas such as the Broads.

#### **65. Which option do you support?**

*“Option HLS2 – Do a review of the GNLP to allocate more deliverable sites if there were no 5-year housing land supply”*

**Comment:** It is suggested that the allocation of more deliverable sites put forward as part of a review of the GNLP should be the focus for future growth. Whilst retaining allocations of previous sites may also be sensible,

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<sup>5</sup> Paragraph: 001 Reference ID: 50-001-20160519

it is suggested that the GNDP should look afresh at opportunities to ensure that a diverse and balanced approach to allocations is pursued. This approach is particularly helpful should more strategic sites stall, and so ensures sustainable sites can still come forward. It therefore incorporates a positive approach within the Local Plan to help boost significantly the supply of housing, as required by Paragraph 47 of the NPPF.

**66. Are there any other issues relating to the GNLDP you would like to raise?**

**Comment:** Our client would like to re-emphasise the importance of housing in rural communities and its importance in contributing to the maintenance and continuing provision of local services and facilities for community use. As such it is pertinent to refer to national planning policy and guidance, namely that set out in the National Planning Policy Framework, National Planning Practice Guidance and Housing White Paper February 2017.

Paragraph 55 of the NPPF outlines that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use, as required by Section 3 of the NPPF: Supporting a Prosperous Rural Economy.

The Housing White Paper, 'Fixing our broken housing market', published in February 2017 highlights the importance of 'Making land available in the right places' and includes proposals for 'Supporting small and medium sized sites, and thriving rural communities' within Chapter 1 of the document. The White Paper<sup>6</sup> identifies a number of proposed changes to the NPPF to facilitate these ambitions, including the expectation for 'local planning authorities to identify opportunities for villages to thrive'.

This was reaffirmed in the recently published consultation on changes to the National Planning Policy Framework (March 2018). Paragraph 80 of this consultation document notes:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services."*

Equally, National Planning Practice Guidance notes that all settlements can play a role in delivering sustainable development in rural areas<sup>7</sup>.

**Closing Comments**

We trust the above comments clearly set out our clients position at this stage. If appropriate, we look forward to engaging with the Greater Norwich Development Partnership through the continued preparation of the Plan.

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<sup>6</sup> Paragraph 1.33, Housing White Paper, February 2017

<sup>7</sup> Paragraph: 001 Reference ID: 50-001-20160519





Yours faithfully,

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