

## **Mulbarton Parish Council's (MPC) response to Stage C Regulation 18 Draft Strategy and Site Allocations Consultation – Greater Norwich Local Plan**

### **Q1 Please comment on or highlight any inaccuracies within the introduction**

Mulbarton Local Plan, which is an adopted neighbourhood plan, needs to form part of the process.

It will be difficult if not impossible to meet these targets if new housing to the scale proposed in the draft strategy is dispersed across the rural areas especially as Mulbarton has seen dramatic growth in the past 20 years which has exceeded provision for services for the community. As part of a village cluster Mulbarton will not receive the same level of scrutiny as the main draft strategy and that the additional dwellings on top of the existing commitment of 1,349 houses is given as 'a minimum of 1,200'.

### **Q3 Please comment on or highlight any inaccuracies within the spatial profile.**

The 2014 National Household Projections are not the most up-to date statistics, nor are they sufficiently robust to be used especially as Mulbarton has had a large housing development in the last 10 years negating even the 2016 National Household Projections.

### **Q6 Do you support or object to the vision and objectives for Greater Norwich?**

The plan is a wish list, but lacks real targets which add to the uncertainty of life in Mulbarton which following 20 years of housing development has had a large scale impact on services and facilities in the village. Developments in surrounding smaller villages (which have no facilities) have also had a large impact on the residents of Mulbarton in regards to traffic and use of facilities including medical and educational as well as commercial. The social wellbeing and quality of life has already changed in Mulbarton with additional families and new residents moving into the area, more housing has not lead to an increase in facilities and services including transport which has diminished. 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.

With the recent large residential developments in Mulbarton, there has been an increased need for journeys from and to work for many of those living in any the new housing, in addition to additional journeys by delivery vehicles to this new housing especially bearing in mind the socio economic profile and lifestyle of the residents who have moved into the new estates.

To minimise the loss of green-field land Mulbarton Parish Council strongly suggests that the best way to achieve this is not to allocate additional sites for housing in "village clusters". Indeed, there are already sufficient allocated sites for housing in the JCS being proposed to be carried forward to the GNLP in the Norwich fringe parishes, main towns and key service centres.

There are conflicts with policies within the current Local Plan, which withstood the rigorous inspection process and Mulbarton Neighbourhood Plan which has given stability and reassurance to its residents. MPC also note that the provision is 9% over the needed allocation and that there is no phasing or statement as to the progress of development on sites which may have already been identified of which there are several around Mulbarton which has been unsettling and caused some anxiety to residents.

### **Q9 Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?**

The document states that 'this plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 9% more homes than "need".' MPC disagree that such a high number of sites should be provided within the GNLP In addition, by proposing not to include windfalls in the buffer the over-allocation of unnecessary housing will be increased further.

It is very disappointing that there is no mention of phasing as an option within the Draft Plan and Housing Delivery Statement, as this would help to prevent the worst excesses of unnecessary development. 69 Parish and Town Councils in Broadland and South Norfolk (over 38%) have supported CPRE Norfolk on this issue and have signed a pledge to this effect. With this groundswell of grassroots opinion making such a strong case, MPC urge the GNDP in producing the GNLP to consider phasing seriously as the most reasonable way forward.

**Q12 Do you support, object, or have any comments relating to the Climate Change Statement?**

Given the stated measures in the Climate Change Statement, it is impossible to see how the proposed additional allocation of sites for housing in “village clusters” can be justified due to the increase need to travel from Mulbarton for secondary education, employment and services plus the delivery of goods to the village.

**Q13 Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?**

A real strength in the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore MPC are very disappointed that this distinction has been abolished and the impact this would have on the village.

MPC has serious misgivings about the separation of sites and allocations for new housing in the “village clusters” that will be allocated a ‘minimum’ of 1,200 houses, rather than giving a maximum number which concerns the residents of Mulbarton who have already seen wholesale development of their village in the last decade. The claim that providing new housing in such locations will support services have proved in Mulbarton to be untrue with little increase in services and has led to increased transport with the knock on effect for climate change.

**Q14 Do you support, object, or wish to comment on the approach for housing numbers and delivery?**

As above MPC have concerns that there is no maximum number for clusters and notes that at the present build rate current commitments cover actual housing need until 2038. MPC do not understand why new areas have to be allocated when the current JCS sites have not all been used and has the potential to allow developers to cherry pick sites.

**Q18 Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?**

MPC believes that the words “as appropriate” in the policy’s introduction would mean that the requirements are far too open to interpretation as to what is “appropriate”

MPC see “village clusters”, being detrimental as they would lead to an increase in petrol and diesel-powered vehicle journeys to and from Mulbarton to work places and with internet based deliveries.

**Q21 Do you support, object or have any comments relating to the approach to the natural environment?**

With the development of industrial areas in the A140, B113 and A47 triangle MPC are disappointed that there is no provision of a Green Belt on a ‘green wedges’ model to prevent continual urban sprawl from Norwich to the rural village of Mulbarton.

**Q22 Are there any topics which have not been covered that you believe should have been?**

Yes, the decision to remove a possible greenbelt for Norwich and the significant reduction in the capacity of Harford Park and Ride to provide a Recycling Centre will limit the possibility of people part commuting from village clusters into Norwich.

**Q23 Do you support, object or have any comments relating to [the] approach to transport?**

Public transport provision needs to be improved and made affordable, not only between Mulbarton, main towns and key service centres, but to and from smaller settlements.

**Q27 Do you support, object or have any comments to [the] approach to affordable homes?**

Affordable and social housing should be provided where needed as a stand-alone provision, to meet the needs of local people.

**Q34 Do you support, object or have any comments relating to the approach to employment land?**

A large amount of greenfield site is reallocated or being developed near Mulbarton and the Parish Council would not want to see this increased.

**Q45 Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.**

“Village Clusters” appear to be an artificial concept, invented to justify the dispersal of housing into the countryside, which will not benefit Mulbarton due to the large amount of recent development in the village. MPC are concerned that completely different approaches are being taken by SNC and Broadland Council in the same plan.

**Q46 Do you support or object or wish to comment on the approach for specific village clusters? Please identify particular issues.**

MPC are concerned that all of the “village clusters” in South Norfolk will not be scrutinised to the same degree as those in Broadland due to being in a separate South Norfolk Village Clusters Housing Site Allocations document.

**Q47 Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.**

MPC believes that windfall sites should be restricted to within settlement boundaries and should also count towards the overall housing targets.

**Q48 Do you support or object or wish to comment [on] any other aspect of the draft plan not covered in other questions? This includes the appendices below. Please identify particular issues.**

Mulbarton and South Norfolk has not benefited from any major infrastructure developments. In the JCS housing concentrated in and close to Norwich was agreed and supported by hugely expensive infrastructure projects, in particular the Broadland Northway( previously known as the NDR), which was primarily constructed to distribute traffic from and to new housing developments on the northern fringes of Norwich and in the North-east Growth Triangle

It would make sense to see the sites allocated for housing in the existing plan (the JCS) developed before any new sites that are likely to be added in to the emerging GNLP are built on