

Statement of Common Ground

Greater Norwich Joint Core Strategy
Development Plan Document
Matter 2 and Matter 3

BIDWELLS

Between:

1. Greater Norwich Development Partnership (GNDP); and
2. Blue Living (8710)



Quality Assurance

Site name: Land to the North East of Norwich

Client name: Blue Living

Type of report: Statement of Common Ground

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Date: October 2010

Prepared by: Ray Houghton BSc (Hons) Dip TP, MRTPI

Signed _____

Date 8 October 2010

Reviewed by: Paul Clarke Dip TP MRTPI

A handwritten signature in black ink, appearing to read 'Paul Clarke', is written over a horizontal line. The signature is cursive and includes a long horizontal stroke at the end.

Signed _____

Date 8 October 2010





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1 INTRODUCTION

- 1.1 This Statement of Common Ground has been prepared by Bidwells on behalf of Blue Living. It relates to representations submitted by Bidwells to the pre-submission version of the Greater Norwich Joint Core Strategy and by Blue Living to the Statement of Focussed Changes in respect of **Policy 4 (Housing Delivery), Policy 9(Strategy for growth in the NPA), Policy 10 (Locations for major new or expanded communities in the NPA)** (Respondent ID: **8710**).
- 1.2 For information, Blue Living is taking forward the promotion of land at North East Norwich on behalf of landowners in control of land to the west of Wroxham Road in Sprowston towards Norwich Airport immediately adjacent to the northern fringe of Norwich.
- 1.3 The location and extent of the land being promoted is approximately 180 hectares.
- 1.4 This Statement of Common Ground reflects the agreed position between the parties on issues related to the identification of North East Norwich as a location for strategic growth and its prospects for delivery. It also acknowledges the GNDP's decision not to proceed with the minor modification strategically to allocate the NE Norwich growth triangle in the JCS.
- 1.5 The agreed position follows negotiations with GNDP officers and the publication of further information by GNDP in the run up to the Examination in Public.
- 1.6 The Statement has been sub-divided under the questions posed by the Inspectors in their Matters & Key Questions for Examination at the Hearings document (20/08/10).

2 MATTER 2 DOES THE JCS MAKE SOUND PROVISION FOR HOUSING DELIVERY (POLICY 4 AND APPENDIX 6: THE HOUSING TRAJECTORY)

Is the JCS's planned provision of housing to 2026 justified, effective and consistent with national policy, including the recent changes to PPS3 Housing with regard to the status of garden land and the deletion of a national indicative minimum density?

- 2.1 The parties agree with the conclusion of the GNDP's Topic Paper: Homes and Housing (August 2010) (paragraph 14) that the JCS's housing provision (36,820 – 37,750 dwellings, 2,050-2,100 dwellings per year) is appropriate and justified and consistent with national policy and necessary to deliver on all reasonable estimates of need and demand.
- 2.2 The parties agree that the East of England Plan (RSS) Housing targets for the Greater Norwich Area for the period 2006-2021 were based on robust locally based assessments of need and continue to reflect current estimates of need and demand.

- 2.3 The parties agree that the JCS's housing provision represents the minimum amount of housing needed to deliver the GNDP's aspirations for affordable housing and housing to support job growth.
- 2.4 The parties agree that the JCS housing provision should be expressed as "at least" 36,820-37,750 dwellings.
- 2.5 The parties agree that the major growth locations will begin to deliver new houses from around 2011/12, but not achieve substantially higher rates of delivery until 2014/15.

3 MATTER 3 STRATEGY AND LOCATIONS FOR MAJOR GROWTH IN THE NPA (POLICIES 9 AND 10 AND APPENDIX 5) INCLUDING CONSIDERATION OF RELATED ACCESS & TRANSPORTATION ISSUES (POLICY 6) AND OTHER INFRASTRUCTURE ISSUES

Part A:

Are the absolute and comparative quantities of growth distributed to the main locations the most appropriate and are they founded on a robust and credible evidence base?

Is this pattern of development deliverable in infrastructure and market terms?

Part B

In Principle does policy 10 and Appendix 5 provide sound procedural basis for strategic allocation of growth triangle?

Is the Northern Distributor Road (NDR) justified and effective in providing key employment and growth locations and releasing road capacity.

What degree of public transport use/modal shift is aimed for? What is the programme for completing the elements of NATS? Timescales for implementing NATS or will NDR generate more cars? Remoteness of ecotown likely to militate against high public transport usage? Can the JCS set minimum thresholds of public transport accessibility?

Is the NDR fundamental to the delivery of the JCS? What are the consequences of an unknown length of delay? Does the JCS have flexibility in this respect? Should growth be more or less constrained by an absence to the funding of the NDR?

Part A General growth distribution – Points of Agreement

- 3.1 The parties agree that the Spatial Portrait is still relevant in light of the RSS revocation and the Norwich Policy Area, including NE Norwich, is still the most appropriate main focus of growth.

- 3.2 The parties agree that strategic growth within NE Norwich provides for a sustainable development pattern, as evidenced in the Sustainability Appraisal. It also ensures the best prospects of encouraging a step change in non-car use by providing homes close to jobs, services and facilities and on public transport routes with the capability to upgrade to more direct frequent services such as Bus Rapid Transport (BRT), linking communities with the Norwich Research Park (NRP) and Norwich City Centre and other destinations.
- 3.3 The parties agree that NE Norwich will provide an early delivery of growth, in conjunction with an equitable and viable CIL/tariff/sec106 approach, which provides the best way of co-ordinating funding and delivering key infrastructure such as public transport upgrades, major road and junction improvement, community and green infrastructure, strategic utilities infrastructure and service provision.
- 3.4 The parties agree that the Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment demonstrate that there is sufficient suitable, available and deliverable land available to accommodate the proposed major growth in the NPA with specific reference to NE Norwich.

Part B Old Catton/Sprowston/Rackheath/Thorpe St Andrew growth triangle (part policy 10 and appendix 5)

- 3.5 The parties agree that the production of an Area Action Plan is an appropriate procedural basis for the strategic allocation of the growth triangle. This will help to co-ordinate the preparation of more detailed masterplans for the development land within it.
- 3.6 It is also agreed that the evidence submitted, including the Sustainability Appraisal, demonstrates that the growth triangle is a highly sustainable location for a range of uses. It will provide opportunities for a step change in transport by means other than by private motor car, and the area can be easily linked to existing and proposed jobs and other facilities in the City Centre and urban fringe.
- 3.7 The parties agree that the growth levels proposed by the GNDP for the growth triangle of at least 7,000 dwellings (rising to a total of at least 10,000 dwellings after 2026) are in keeping with strategic requirements. This is based on robust and credible locally derived evidence and justified in terms of the Sustainability Appraisal, Strategic Housing Market Assessment, Strategic Housing Land Availability and other evidence relating to housing need.
- 3.8 The location of growth to the north of the City (i.e Broadland) has been the subject of considerable work prior to the preparation of the GNDP Core Strategy. The parties agree that

the growth triangle represents the best location for sustainable strategic growth to the north and east of Norwich.

- 3.9 The parties are agreed that an amount of growth can occur in the period before the entire NDR is constructed and available for use.

4 **MATTERS STILL IN DISPUTE**

- 4.1 The outstanding matters of dispute between the parties are:

- **Affordable Housing target, including evidence base (Drivas Jonas Deloitte viability Study).** Blue Living considers that the affordable housing target is not deliverable; the supporting evidence is less than robust and it fails to justify the target. Blue Living also considers that the target should be set at a level that is deliverable in the majority of cases on a strategic scale and should take account of the cyclical nature of housing markets.
- **Requirements to achieve levels of building sustainability in advance of national standards.** Blue Living considers that there is insufficient evidence setting out the local circumstances that warrant the approach; and that insufficient evidence is available to demonstrate that such an approach is viable. The highest levels of the Code for Sustainable Homes are not optimal in achieving very low carbon sustainable buildings and should never be used as a proxy for low carbon sustainable development as a whole. Blue Living greatly favours a total environmental and carbon footprint approach to delivering credible and authentic sustainability. This has the advantage of taking account of the impacts and mitigation strategies for a whole development including, for instance, traffic.
- **Requirements for major development to link to a dedicated contractually linked decentralised and renewable or low carbon source.** Blue Living considers that there is insufficient evidence setting out the local circumstances that warrant the approach; and that insufficient evidence is available to demonstrate that such an approach is viable. Blue Living nevertheless believes that minimum standards for local renewable generation should be set and that very high standards should be achieved over the life of a large scale development; it is simply that a one-size fits all circumstance is not appropriate. A total carbon footprint approach would help address this issue to the great benefit of the quality and sustainability performance of all new development in the GNDP.
- **Requirements for major development to provide for community infrastructure, cultural and entertainment provision.** Blue Living consider that whilst a critically important part of a sustainable community, provision should have been made in the policy

to allow for alternative methods of delivery of facilities and negotiation on the provision of facilities such as a community hall and enhanced open space provision in light of scheme viability. Delivery partnerships – private, public and third sectors - working closely together for large scale places and communities will need to be highly innovative in the financing, provision, governance and management of essential social infrastructure of various kinds.

- **Demonstration of a supply of developable housing land for 0-5 years.** Blue Living considers that the JCS should be amended to confirm the mechanism for managing growth in years 0-5 including the calculations of 5 year supply needs to be made on the basis of the NPA.
- **Further work needs to be undertaken on the phasing of development.** Blue Living firmly believes that there needs to be a radical modal shift across the GNDP area to combat congestion. Only then can a profoundly positive impact be achieved on climate change issues and in creating better places and streets. Further evidence needs to be gathered to understand the capacity of the surrounding road network and the potential for modal shift in new and existing development to accommodate growth in advance of the NDR's completion.

Statement of Common Ground NE Norwich

Signed on behalf of Greater Norwich Development Partnership:

Position:

Date:

Signed by Bidwells on behalf of Blue Living

Position:

Date:

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