



Matter 3A – General Strategy
for the Growth Locations
Representor No. 8826

**JOINT CORE STRATEGY FOR BROADLAND,
NORWICH AND SOUTH NORFOLK**

EXAMINATION

**MATTER 3A – GENERAL STRATEGY FOR THE
GROWTH LOCATIONS**

**SUBMISSION ON BEHALF OF TAYLOR
WIMPEY DEVELOPMENTS AND HOPKINS
HOMES**

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APPENDICES

Appendix A - A Flexible Supply of Land for Housing

1. OVERALL DISTRIBUTION OF GROWTH

The Level of Housing Provision

- 1.1 The revocation of regional strategies by the Secretary of State on 6th July does not inevitably lead to a reduction in the planned provision of new housing (Appendix A). Paragraph 10 of PPS3 identifies the Government's housing policy objectives, including the delivery of *"a sufficient quantity of housing taking into account need and demand and seeking to improve choice."* Paragraph 38 of PPS3 requires LDDs to establish a strategy for the planned location of new housing *"which contributes to the achievement of sustainable development."* One of the elements to be taken into consideration is *"evidence of current and future levels of need and demand for housing."*
- 1.2 The Government is committed to housing growth and the provision set out in the JCS is justified, effective and consistent with the Government's key housing policy goal which is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they wish to live. In order to achieve this, the Government is seeking to improve affordability across the housing market, including *"by increasing the supply of housing."* Paragraph 9 of PPS3 refers to the need to *"address the requirements of the community."*
- 1.3 The various data streams investigated in EIP 70 indicate that it would be inappropriate to proceed with the JCS on the basis of a housing provision figure that is less than that identified at paragraph 5.3 of EIP 70. A lower level of development would constrain housing delivery, with negative implications for economic development and the affordability of housing in the Norwich area.
- 1.4 Paragraph 11 of PPS3 requires LDDs to be informed by a robust, shared evidence base, *"in particular, of housing need and demand, through a Strategic Housing Market Assessment and land availability, through a Strategic Housing Land Availability Assessment."* Sections 6 and 11 EIP 70 describe the information that can be gleaned from the SHMA and SHLAA.
- 1.5 EIP 70 refers to the output derived from the East of England Forecast Model which suggests that an additional 40,000 dwellings will be required in the Norwich area in the period 2008-2026 *"to support the growth potential of the local economy"*. Paragraph 5.37 of JCS1 notes that research has suggested that the local economy has the potential to provide sufficient jobs to support the level of housing proposed.

Paragraph 36 of PPS3 states that the Government's policy, in support of its objective of creating mixed and sustainable communities, is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. It is necessary to seek to secure a planning policy framework which delivers sufficient new housing to support local economic development. We endorse the proposed change to paragraphs 6.1, 6.2 and 6.5 of the JCS set out at Appendix 3 of EIP 77.

- 1.6 Paragraph 33 of PPS3 requires the level of housing provision to be determined via an evidence-based approach which should take into consideration the Government's latest household projections and the needs of the local economy, having regard to economic growth forecasts. The CLG 2006-based household projections suggest an additional 43,200 households in the Norwich area in the period 2008-2026. This source of information, taking forward the advice to be found in PPS3, provides further evidence to indicate that the housing provision described in the JCS is the minimum required to support the economic growth of the area and deliver the Government's housing policy objectives.

Strategy for Growth in the Norwich Policy Area

- 1.7 Policy 9 of the JCS states that the NPA is the focus for major growth and development. Costessey/Easton is expected to deliver a minimum of 1,000 dwellings. The construction of new dwellings at the western edge of Norwich has formed a consistent theme during the preparation of the JCS. The locational advantages of the Costessey area identify it as a place where sustainable and effective growth can be achieved.
- 1.8 Paragraph 38 of PPS3 refers to the criteria to be utilised by local planning authorities when identifying locations to accommodate new housing. One of the matters to be weighed in the balance is the accessibility of a proposed development area to existing local community facilities, infrastructure and services, including public transport. The location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services. Paragraph 36 of PPS3 indicates that the Government's policy, in support of its objective of creating mixed and sustainable communities, is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure.

These outcomes can be achieved by implementing the spatial strategy described at Policies 9 and 10 with regard to Costessey.

- 1.9 The strategic significance of Costessey was discussed during the course of the South Norfolk Local Plan Inquiry. When considering the Norwich Policy Area, the Inspector was of the view that the bulk of the new housing provision should be in locations on the edge of Norwich and in settlements with good communication links to the City. He regarded Costessey as being in the highest category of housing locations available within the NPA:

“In my overview of the settlement and other introduction paragraphs to Section 28 of Part 2 of this Report, I place Costessey in the highest category of housing location available to the District Council within the Norwich area. Moreover, the objection land lies directly alongside one of the main radial routes into the City Centre, and midway between the major development areas of Bowthorpe and Longwater, so both large scale employment opportunities and retail facilities are close at hand.”

- 1.10 Those comments were made in the context of the Inspector’s assessment of the acceptability of new housing at Lodge Farm which is now allocated by virtue of Policy COS2 of the South Norfolk Local Plan. The Inspector’s broad conclusions regarding the sustainability credentials of Costessey are equally valid in the circumstances of the JCS and, accordingly, the proposals within the JCS for further growth at Costessey are justified and effective when viewed in the context of this area’s characteristics/land use activities.
- 1.11 Strategic Principle 3 of the South Norfolk Local Plan recognises that a major element of growth in the NPA is to be accommodated in the South Norfolk element of the NPA. In these circumstances, subject to environmental and infrastructure conditions, development is accordingly to be directed to locations selected because they will minimise the need for travel, and which have good access by public transport, cycling and walking. In broad terms, Costessey exhibits the necessary locational attributes that indicate that it is capable of accommodating further growth as anticipated in the JCS.
- 1.12 The SNLP acknowledges that Old Costessey and New Costessey offer a wide range of social and community facilities. Direct access to Norwich City Centre is provided along the A1074 Dereham Road whilst good access to the southern edge of the City is provided by the A47 Norwich Southern Bypass. It is noted that the settlement “is

strategically very well placed as a location for new development.” Furthermore, when considering the Lodge Farm housing land allocation, the SNLP notes that this allocation is proposed “in recognition of Costessey’s status as one of the District’s prime sustainable locations for new housing.”

- 1.13 The provision of further housing at Costessey would be extremely well related to the strategic employment area at Longwater and the employment opportunities at Bowthorpe. It is equally relatively close to the Norwich Research Park and adjoins the Sainsbury’s superstore and related retail facilities. The area is served by a public transport corridor and is well located relative to the A47. Given the general intention of the JCS to seek a closer relationship between new housing, jobs and services, the Costessey area is an effective growth location. Its identification in Policies 9 and 10 of the JCS is founded on a robust and credible evidence base.

2. A DELIVERABLE PATTERN OF DEVELOPMENT

- 2.1 The delivery of the spatial strategy for the Norwich area will incorporate development arising at planned urban extensions of a moderate scale, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved educational provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich.
- 2.2 The achievement of the necessary housing delivery rates in the short/medium term will be secured as the JCS promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years, the required rate of delivery will be achieved by concentrating new housing on sites that presently have the benefit of planning permission and new allocations which can be developed expeditiously, augmenting and building upon existing facilities in established neighbourhoods. Not only is it important to ensure that new housing is supported by essential community facilities/infrastructure but it is also equally vital to confirm that the proposed urban extensions are integrated with the existing built-up area of Norwich. New development areas associated with the built-up area of the City should exhibit a strong degree of interaction with that existing urban area.
- 2.3 Policy 10 of the JCS refers to the facilities available at Longwater and Bowthorpe. The area at the western edge of Norwich exhibits strong sustainability credentials. It is an appropriate location for growth and an extension of the existing Lodge Farm development can play a vitally important role in the short/medium term by assisting in the generation of the required initial momentum for the Norwich growth area.

Infrastructure

- 2.4 Infrastructure provisions of sewerage and bus priority measures incorporated into the existing Lodge Farm development make the delivery of the Lodge Farm extension of at least 500 dwellings achievable in the short term/medium term.
- 2.5 Improvements to the Longwater Interchange is listed as a Priority 1 Infrastructure scheme in EIP 84 is acknowledged but due to the location of Costessey to the east of the interchange and the introduction of a Bus Rapid Transit along the Dereham Road corridor and a bus service from Easton/Costessey to Norwich Research Park, does not impact on the delivery of Lodge Farm from 2013. Subsequent development in

either Costessey or Easton will require the improvements and the meeting of the 2016 estimated delivery date for this will allow continuous delivery of development in the area beyond 2016.

3. A FLEXIBLE STRATEGY

Developable Housing Land

- 3.1 Paragraph 53 of PPS3 states that local planning authorities should set out in LDDs *“their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.”* EIP 70 does not contain a housing trajectory whilst Table 11 of EIP 85 identifies the anticipated trajectory for the delivery of new dwellings from the proposed growth locations. However, Appendix 6 of the JCS does provide an indication of the anticipated delivery of new housing on an annual basis in the period 2001-2026. The GNDP paper entitled ‘Five-Year Supply of Housing Assessment-Base Date 1st April 2009’ states that, at that stage, there was a supply of 3.76 years in the Norwich Policy Area.
- 3.2 An improvement in delivery could be achieved if Table 11 of EIP 85 were to be amended to indicate that some of the growth locations could commence development earlier than 2014/15. The GNDP assessment of the five year supply of housing describes the administrative actions that need to be undertaken, with particular reference to paragraph 71 of PPS3.
- 3.3 We endorse the approach in Policy 4 of the JCS that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to secure a framework to accommodate housing in the period 2008-2026. The implications of the revocation of the East of England Plan are covered in EIP 70. That document provides continuing justification for the observation in the table at page 43 of the JCS that there is a need to identify ‘new’ land to accommodate approximately 20,275 dwellings in the NPA in the period to 2026.
- 3.4 Paragraph 33 of PPS3 refers to the process of determining an appropriate level of housing. As noted at paragraph 1.6 above, one of the issues to be taken into account is the Government’s latest published household projections. The 2006-based household projections were published by CLG in March 2009 and suggest an increase of 114,000 households in Norfolk in the period 2006-2026. By way of comparison, the housing provision established in the revoked East of England Plan for Norfolk anticipated the construction of 83,120 dwellings in the period 2006-2026. Thus, the Government’s most recent household projections anticipate a significant

increase above the dwelling requirement previously to be found in the East of England Plan.

- 3.5 The revoked East of England Plan anticipated the construction of 40,000 dwellings in Broadland/Norwich/South Norfolk in the period 2006-2026. The 2006-based household projections suggest an increase of 48,000 households across the GNDP area in the period 2006-2026. As with Norfolk as a whole, the latest household projections for the GNDP area suggest a housing requirement figure greater than that described in the tabulation at page 43 of the Joint Core Strategy.
- 3.6 We agree with Policy 4 of the JCS which indicates that allocations will be made to ensure that at least 33,000 new homes can be delivered in the Norwich Policy Area between 2008 and 2026. We endorse the extent of the NPA as shown in Appendix 4.
- 3.7 The achievement of the necessary housing delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. The new development areas must exhibit a strong degree of interaction with the existing communities/built fabric.
- 3.8 An extension of the present Lodge Farm development will ensure continuity in the delivery of new housing at this sustainable location. The area is deliverable and developable within the terms of paragraphs 54 and 56 of PPS3. The site is available, suitable and capable of delivery from 2013. The trajectory for the growth locations at page 111 of the JCS should be modified to refer to the commencement of development at Costessey in 2013/14.

4. KEY INFRASTRUCTURE

- 4.1 EIP 84 states that 2016 is the estimated delivery date of improvements to the Longwater Interchange. Based on existing travel patterns, in the order of twice the number of vehicle trips from a development in Costessey are predicted to travel towards the centre of Norwich than they are to the Longwater Interchange and the A47. Bus service improvements through the introduction of the Bus Rapid Transit along Dereham Road and a bus service from Easton/Costessey to Norwich Research Park has the potential to reduce the number of private car trips being generated from Costessey.
- 4.2 Considering these factors, initial assessment of trips from an extension of Lodge Farm of approximately 500 dwellings predicts that the current layout of Longwater Interchange has capacity to accommodate these movements. Improvements to the interchange by 2016 will then allow further development in the area.
- 4.3 The Lodge Farm site is located adjacent to A1047 Dereham Road. This allows the development not only to benefit from a Bus Rapid Transit along the road but also to improve it. The additions to the BRT and other bus services are possible in the form of junction improvements, bus priority measures and bus stop enhancements. Provision for these improvements were allowed for in the previous highway works undertaken for the existing Lodge Farm development.
- 4.4 As mentioned in EIP 85 Draft Local Investment Plan and Programme, up to 500 dwellings only are possible without the construction of a new strategic Interceptor Sewer. As a part of the existing Lodge Farm development, a foul sewer was laid to accommodate at least 500 dwellings in addition to the existing development. Therefore, the waste water infrastructure is in place to commence delivery of up to 500 dwellings at the Lodge Farm extension from 2013.
- 4.5 This allows the delivery of 500 dwellings, which are not reliant on an Interceptor Sewer, to commence immediately while the design and construction of the sewer takes place for further growth in the rest of the Easton/Costessey area.
- 4.6 The location of Lodge Farm between Longwater Retail Park, Bowthorpe, the Longwater Park and Ride and Bawburgh Lakes makes it ideally situated to provide pedestrian and cycle links to and from these areas and facilities. Non-vehicle links to Longwater are in line with Policy 10 of JCS and EIP 84 and links to Bawburgh Lakes

to aid the formation of a country park are also in line with Policy 10 but also with EIP 85 Draft Local Investment Plan and Programme.

APPENDIX A

A FLEXIBLE SUPPLY OF LAND FOR HOUSING

Government Housing Objectives

- A.1 The Minister for Housing and Local Government told the RICS in London on 8th June 2010 that *“if we are really serious about supporting people’s aspiration for home ownership, the real prize is we must build more homes.”* He noted that it was necessary *“to build more homes and entrench sensible lending practices so that, in the long run, houses will become more affordable.”*
- A.2 The Government published the third edition of PPS3 on 9th June 2010. PPS3 sets out the national planning policy framework for delivering the Government’s housing objectives. Those objectives have been developed in response to recommendations in the ‘Barker Review of Housing Supply’ and a principal aim of PPS3 is to underpin the Government’s response to that Review and the necessary step-change in housing delivery, through a more responsive approach to land supply at the local level. Paragraph 10 of PPS3 states that the planning system is expected to deliver *“a sufficient quantity of housing taking into account need and demand and seeking to improve choice.”*
- A.3 On 24th June 2010, the Secretary of State for Communities and Local Government was asked in Parliament what guidance his Department provides to Councils *“on assessing levels of housing need in their area.”* In a Written Answer, the Parliamentary Under Secretary of State stated that PPS3 *“and the Strategic Housing Market Assessment Practice Guidance can assist local authorities on how to assess the level of housing need in their area.”* He noted that the Secretary of State had issued a letter dated 27th May 2010 and observed that *“decisions on housing supply will rest with local planning authorities without the framework of regional numbers and plans.”*
- A.4 Paragraph 32 of PPS3 requires that the level of housing provision should be determined by taking an evidence-based approach. In seeking to understand the level of housing required, local planning authorities are expected to take into account *“evidence of current and future levels of need and demand for housing and affordability levels”* based upon local information set out in strategic housing market assessments and the Government’s latest published household projections. Furthermore, the assessment of an appropriate local level of housing is also expected to take into account the Government’s overall ambitions for affordability

across the housing market, *“including the need to improve affordability and increase housing supply.”*

- A.5 The Secretary of State indicated on 6th July that the Government is *“committed to housing growth.”* Imposed *“central targets will be replaced with powerful incentives”* and he has confirmed that this will ensure that those local authorities *“which take action now to consent and support the construction of new homes will receive direct and substantial benefit from their actions.”* These incentives will encourage communities *“to increase their aspirations for housing and economic growth.”*
- A.6 CLG’s Chief Planner wrote on 6th July to all chief planning officers about the revocation of regional strategies. Attached to his letter is guidance following that revocation, noting that local planning authorities should continue to develop core strategies and present evidence to support their approach. The examination process will continue to assess the soundness of DPDs and *“Inspectors will test evidence put forward by local authorities and others who make representations.”* Local planning authorities are expected to *“collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process. They should do this in line with current policy in PPS3.”*
- A.7 On 9th August 2010, the Minister for Housing and Local Government wrote to all local authorities on the issue of the ‘New Homes Bonus’ scheme. In that letter, the Minister states that *“the Coalition Agreement makes a clear commitment to providing local authorities with real incentives to build new homes. These incentives will directly reward councils for new homes built, and we will be consulting on the detail later this year. Because we are committed to housing growth, introducing these incentives will be a priority and we aim to do so early in the Spending Review period.”*