



**Written Statement to the Joint Core
Strategy Examination
Greater Norwich Development
Partnership**

On behalf of:
**Country and Metropolitan Homes
(Formerly Gladedale Anglia)**

In respect of:
Matter 3, Part C (D, E, F)

Date:
8th October 2010

Respondent Reference:
8203

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1.0 Introduction

- 1.1 The following written statement is provided on behalf of Country and Metropolitan Homes (Formerly Gladedale Anglia) in advance of their attendance at the scheduled Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk. The statement has been prepared having regard to the guidance provided to respondents on the submission of statements and addresses only those Matters and Key Questions for Examination raised by the Inspector. Specifically, this statement supports and further elaborates upon the comments submitted by Bidwells, on behalf of Country and Metropolitan Homes, on the 14th December 2009.

2.0 Response to Matter 3, Part C

D. Does the JCS make clear, justified and effective growth proposals for Hethersett. Is it allocated more growth than suggested by its position as a key service centre in the hierarchy of centres (see policies 14 and 19).

Justified

- 2.1 No – Policy 9 directs at least 1000 dwellings to Hethersett as part of the overall strategy for growth. This option (Option 2+) is considered by the Pre-Submission Sustainability Appraisal (JSC3) to have generally positive impacts. Previous options (Options 1 + 2) which directed increased growth to Hethersett, in the region of 4000no. dwellings, were consistently considered to offer a more sustainable option. The Pre-Submission Sustainability Appraisal therefore concludes that Option 1 would generally perform very well against sustainability criteria and that Option 2 would also generally perform well.
- 2.2 These conclusions have been brought forward, unaltered, from the Issues and Options Sustainability Appraisal and the Reg 25 Sustainability Appraisal. When assessing growth in the South West Area (Hethersett/Lt Melton, later Hethersett/Cringleford) the Issues and Options Sustainability Appraisal considers that the 'scale of development in this location would need to be large enough to provide a wide range of services' (p302). Although the Sustainability Appraisal does not seek to quantify the level growth needed to support 'a range of services', it is clear from later appraisals that the 4000no. dwellings proposed by Options 1 and 2 were favourably assessed, such that this level of growth was deemed to be sufficient to improve the sustainability of Hethersett.
- 2.3 It would appear from GNDP's Background Paper 6 (Response to Inspectors Questions) that the reasons for reducing the level of growth directed to the South West Area (inc. Hethersett) were; (1) the need for a lower number of allocations (due to revised housing monitoring info 24,000 – 21,000 in NPA); (2) a sustainable alternative location allied to political concerns: and (3) form and character considerations, allied to the easing of educational pressures (BP6, Appendix 4). None of these reasons suggest that growth in Hethersett should be limited to 1000 dwellings, indeed the arbitrary figure of 1000 would appear to be the result of circumstances elsewhere in the NPA.

2.4 It is therefore considered that growth proposals for Hethersett have been artificially limited, when in fact the settlement is entirely appropriate to accommodate an increased level of development.

Effective

2.5 The JCS seeks to direct at least 1000 dwellings to Hethersett. Strategic growth of this scale will inevitably take a considerable period of time to come to fruition. Indeed, a significant amount of work will need to be undertaken before a specific location for growth is agreed upon via the LDF process. Following this, planning permission is likely to be pursued via an outline application. This approach would allow for the growth location to be comprehensively planned but would also offer sufficient flexibility to allow parcels of land to be brought forward by multiple developers, all of which will inevitably have their own requirements at the detail planning stage. The submission of reserved matters applications thereafter will depend to the commercial aspirations of the various developers involved.

2.6 The housing trajectory provided at Appendix 6 of the JCS indicates that strategic growth in Hethersett will begin to deliver new dwellings in the monitoring year 2014/15. This would seem to be entirely optimistic, bearing in mind that the South Norfolk Site Specific and Allocations DPD is not anticipated for adoption until the early part of 2012 at the earliest. Should it be necessary to prepare an Area Action Plan of a Supplementary Planning Document to guide strategic growth in Hethersett, then this process would be prolonged further.

2.7 Accordingly, although there is no reason to doubt the appropriateness of Hethersett to deliver strategic growth in accordance with the JCS allocation, there will be a significant gap in the early part of the plan period, within which Hethersett, along many other growth locations, will deliver no new housing. The JCS does not address this matter and as such would fail to secure a continuous supply of housing. PPS3, at paragraph 53 is quite clear that Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering a continuous supply of housing for at least 15 years from the date of adoption. Bearing in mind that the Housing Land Supply Statement published by the GNDP in February 2010 confirmed that there are sufficient committed sites within the NPA to deliver only 3.76 years supply (against the RSS target), it is clear that additional housing will need to be brought forward in the first 5 years of the plan to supplement existing

commitments. Although the GNDP are in the process of reviewing this document to place greater emphasis on housing land supply at a district wide level, the fact remains that there is a shortage of committed sites when the NPA is considered holistically.

- 2.8 At Appendix D, the Housing Land Supply Document confirms that in Hethersett commitments exist for only 29no. dwellings and that these are anticipated for completion by 2011/2012. In order to ensure that there is a continuous supply of housing in Hethersett, the JCS must therefore plan for the early release of land, in addition to that which will come forward as a result of the strategic allocation.
- 2.9 Such an approach can be secured without significant alterations to the JCS. In addition to strategic allocations, Policy 9 makes provision for the delivery of a further 1800no. dwellings in South Norfolk (NPA). No certainty is however offered, as to where these units should be directed, other than that they should be delivered on small sites in the NPA and/or as additions to named growth locations.
- 2.10 It is considered that by indicating where the aforementioned 1800no. units should be directed, the JCS would offer sufficient certainty for smaller sites to come forward in advance of large strategic allocations, thus securing a continuous supply of housing in the early part of the plan period.
- 2.11 In Hethersett, land north of Great Melton Road (see plan at **Enclosure 1**) has long been identified as the first phase of any future expansion to the settlement. The attributes of the site lend themselves to early delivery, indeed there are no physical, planning, ownership or technical constraints which would prevent the land from coming forward immediately. The deliverability of the site is collectively demonstrated by the Planning Overview and associated documents provided at **Enclosure 1**. These confirm that the land is available for early release in order to secure the continuous supply of housing, not only in Hethersett itself but also in the wider NPA.
- 2.12 It is therefore considered that in order to provide certainty over the delivery of housing over the early part of the plan period (years 0-5) the JCS should, at the very least, direct 200no. of the 1800no. allocation to Hethersett. It is for the GNDP and the Inspector to determine where the remaining dwellings should be distributed for

both South Norfolk and Broadland, based on the background evidence which has been accumulated to date.

Hierarchy of Centres

- 2.13 The supporting text to Policy 14 states that *"key service centres have a range of facilities enabling them to meet local needs as well as the needs of residents of the surrounding area. Typically these are a primary school, a secondary school either within either within the settlement or easily accessible by public transport, a range of shops and services, a village hall, primary health care, and a library. They also have public transport services for non-journey to work and leisure purposes"*. Hethersett already benefits from all of these services and facilities and is therefore quite rightly identified for strategic growth.
- 2.14 Hethersett is also well located in terms of public transport accessibility and offers excellent potential for improved services along the A11 corridor (see BP7 NATS Implementation Plan).
- 2.15 As has been discussed at length above, the various sustainability appraisals which have informed the preparation of the JCS, have each supported a strategy which directs more growth to Hethersett than the GNDP's preferred option (option 2+).
- 2.16 In these terms, there is significant evidence to support an approach which directs more growth to Hethersett and there is certainly no doubt therefore that the settlement can accommodate the level of growth envisaged by the JCS.

E. What are the critical infrastructure dependencies for this location and can delivery of growth take place within the timescale set out on page 111 of the JCS.

- 2.17 When discussing Hethersett, Policy 10 states that *'this location is dependent on expanded capacity at the Thickthorn Junction'*. The term 'dependent' suggests that growth in Hethersett would be limited until such a time that expanded capacity at the Thickthorn Junction is available. The GNDP have however recently updated the table at Appendix 7 of the JCS to include the expected delivery date for key elements of infrastructure. The revised table (provided within the revised Appendix 7 at Appendix 1 of the GNDP response to Inspectors requirements – EM Conclusions Issue 1) confirms that upgrade works to the Thickthorn Junction are a 'Priority 1' matter but

that they are unlikely to be delivered until 2016.

2.18 The JCS fails to clarify whether growth in Hethersett would be constrained until expanded capacity is available at the Thickthorn Junction, however, 'Priority 1' infrastructure is defined to be "fundamental to the strategy or must happen to enable physical growth" (Page 2 GNDP response to Inspectors requirements – EM Conclusions Issue 1).

2.19 If there is to be any delay in delivery as a result of infrastructure deficiencies, then it is even more crucial that the JCS provides greater certainty as to the location of the 1800no. dwellings to be delivered on 'smaller sites and possibly as additions to named growth locations' within South Norfolk. Such sites can come forward without the need for significant infrastructure improvements in order to bridge any gap in housing delivery. In the case of Hethersett, 200 units could be delivered at land north of Great Melton Road, without the need for infrastructure enhancements as is confirmed by the Transport Overview at **Enclosure 1**.

2.20 The JCS, at Policy 10 should nonetheless offer greater clarity over the term 'dependent' and, if applicable, set out any limitation to growth until capacity at the Thickthorn Junction is expanded.

F. If the JCS is unsound in relation to Hethersett, are there any specific changes that would render it sound?

2.21 The JCS is considered to be unsound for the following reasons:

- It does not sufficiently plan for the delivery of housing in Hethersett in the early part of the plan period (years 0-5). The strategy is reliant on large scale strategic growth which will take a considerable time to reach the point of delivery. There is no certainty over the continuous delivery of housing in the interim period.
- The allocation of 1800no. dwellings on smaller sites and/or as additions to named growth locations fails to achieve a planned and properly managed approach to housing delivery. Broad locations should therefore be identified to which the 1800no. dwellings can be directed.

- When discussing Hethersett, the term 'dependent' within Policy 10 fails to clarify whether the expansion of the Thickthorn Junction would limit or delay the delivery of strategic growth in the settlement.

2.22 In order to provide sufficient certainty to facilitate the delivery of sites such as land north of Great Melton Road, it is considered that **the third bullet point of Policy 9 should be deleted and the 1800no. units for South Norfolk should be distributed amongst the identified strategic growth locations** (Hethersett, Wymondham and the Costessey/Easton area). This approach would provide sufficient certainty to ensure that new dwellings are provided in a timely manner, either through the development control process or as site specific allocations via LDD's. It is of course pertinent to note that this approach would not prevent planning permission being granted for additional small scale windfall development, on an ad-hoc basis, as and when the market dictates.

2.23 In addition to the above, **Policy 10 should be amended to clarify whether the delivery of strategic growth in Hethersett would be limited, until expanded capacity is delivered at the Thickthorn Junction.** Such clarification should be inserted into the opening paragraph, under the title 'Hethersett'.

2.24 It is considered that the revisions set out above are justified within the scope of the existing evidence base and therefore, would not require any further consultation or sustainability appraisal.

3.0 Conclusion

- 3.1 PPS3, at paragraph 53 is quite clear that Local Planning Authorities should set out in Local Development Documents their policies and strategies for delivering a continuous supply of housing for at least 15 years from the date of adoption. The JCS fails to effectively secure the continuous delivery of housing across the plan period, within both Hethersett and the wider NPA.
- 3.2 The GNDP have acknowledged that there is an existing shortfall of committed sites, within the NPA to satisfy strategic targets and yet, the JCS fails to facilitate the early release of appropriate sites to address this shortfall. The emphasis which is placed on the delivery of housing via strategic growth locations is welcomed, however the JCS is not realistic over the period of time which will be required to secure completions on such sites. Accordingly, there will inevitably be a shortfall in delivery in the early part of the plan period, unless the JCS provides greater certainty to facilitate the early release of smaller sites which are not constrained by the same land ownership, comprehensiveness and planning policy complications that will inevitably delay strategic growth.
- 3.3 Those dwellings which are allocated by Policy 9 to 'smaller sites and possible additions to named growth locations' provide an opportunity to address the identified shortfall in supply. By providing certainty over where these dwellings should be delivered, the JCS would facilitate the early release of smaller sites, including those in Hethersett such as land north of Great Melton Road, which would contribute to meeting the identified shortage across the NPA.
- 3.4 Country and Metropolitan Homes therefore consider that the third bullet point of Policy 9 should be deleted in order that those units allocated for delivery on 'smaller sites, and as possible additions to named growth locations' within South Norfolk and Broadland may be distributed appropriately. Failure to provide certainty over the location these units would severely compromise the continuous supply of housing across the NPA and thus render the JCS unsound.

Enclosures

Enclosure 1 Land north of Great Melton Road, Hethersett – Supporting documents

- Planning Overview (DPP)
- Design and Landscape Statement (Bidwells)
- Drainage and Services Appraisal (Cannon)
- Extended Phase 1 Habitat Survey (Ecology Consultancy)
- Transport Overview (David Tucker Associates)
- Geophysical Survey (North Pennines Archaeology)

Enclosure 1

Land north of Great Melton Road, Hethersett – Supporting documents

Planning Overview (DPP)

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