

Inspector Roy Foster
Assistant Inspector Mike Fox
C/o Programme Officer, Louise St John Howe
Claypit Hall
Foxearth
Sudbury
Suffolk
CO10 7JD
And at lstjohnhowe@hotmail.co.uk

Dear Sirs,

Representations by Beyond Green Developments to the suggested changes made by the Inspectors to the Greater Norwich Development Partnership's Joint Core Strategy

Thank you for the opportunity to respond to your suggested changes to the Greater Norwich Development Partnership's Joint Core Strategy. Beyond Green Developments representations are:

1 Preamble

1.1 Beyond Green Developments (BGD) has an interest in land in the North East Norwich Growth Triangle between Norwich International Airport in the west and the Wroxham Road to the east. It is working with landowners and local stakeholder groups to create a development plan for an urban extension to Norwich which will be produced in parallel with the emerging Area Action Plan (AAP) for the Growth Triangle (GT) should the Greater Norwich Joint Core Strategy (GNDP JCS) be found to be sound.

1.2 Representatives of BGD, some from the company and others from its planning consultants, Bidwells, attended all of the Examination in Public (EiP) of the JCS so what is said in this submission is based on a thorough understanding of the issues.

1.3 In general, BGD agrees with the inspectors' suggested changes and supports them as they apply to land in the northern and north western part of the GT. Rather than treat each suggested change as a separate and detailed matter, the contents of this submission cover the broader aspects, including the policy principles underpinning each issue. For clarity's sake, BGD has made its representations on change references IC1, IC2&3, IC4 and IC6. The other suggested changes are accepted.

2 Suggested change IC1: Flexibility/resilience of the JCS in relation to the Northern Distributor Road (NDR)

2.1 As suggested BGD has referred to supporting document RF117.

2.2 Under Policy 10 on pages 62 and 63, BGD has the following observations while agreeing with the changes in principle. Although the scope for policy flexibility is limited by the available evidence base the proposed changes allow that development in the Growth Triangle can be commenced prior to the delivery of the NDR and that there is an opportunity for more evidence to be collected and analysed and greater certainty to be given to the scale, location and pace of development in advance of the NDR which will be explored in depth through an Area Action Plan (AAP) or similar process. The difficulty lies in the interpretation of "the growth triangle **in its entirety**". As written this could mean no growth or some growth and if the latter, how much and where? The point is later clarified but not entirely in the references to an AAP. It is and will remain BGD's working assumption that the issue of location and scale (and implicitly

timing) will be explored through a new evidence base being created and its interpretation being refined through challenge during the AAP process.

2.3 In the revised para 6.18 on pages 67 and 68, BGD would like to concentrate particularly on the part of the revision which says “... **The completion of appropriate improvements at Postwick Junction would allow for some development in the Old Catton, Sprowston, Thorpe St Andrew growth triangle in advance of the NDR**”. The Highways Agency, in one of its contributions to the EiP, said that with the relatively minor scheme which has been approved and which could be easily implemented at Postwick, the further north and west any development in the GT was located pre-NDR, the better, since the effect on the junction and the A47 would be minimised. BGD supports that view fully.

2.4 Regarding Policy 20 on page 63 (the suggested new paragraph after p7.11), headed ‘**Contingency**’, BGD fully supports the inclusion of all of the suggested changes and is especially supportive of:

“The GNPD will be working to bring forward all growth proposals and associated infrastructure as early as possible to maximise delivery and flexibility. This will be facilitated by engagement with developers to understand opportunities, overcome constraints and maximise development potential without compromising quality.

“There is no phasing of growth in the JCS beyond that imposed by the provision of infrastructure. At the time of adoption the provision of most critical elements of infrastructure is not expected to be a significant constraint. However, there remains some uncertainty around the timing of the delivery of the Northern Distributor Road (NDR) ...

“At the base date of the JCS there is a significant housing commitment that is unaffected by infrastructure constraints. Delay in delivering the NDR does not prevent JCS provision of housing or employment development within Norwich City or South Norfolk Council areas, or existing housing commitment in Broadland ... Indeed, market pressures are likely to bring forward development in these locations in this scenario.

“The existing commitment and the range and scale of growth proposals across the JCS area provide significant flexibility to bring forward growth in those locations unaffected by infrastructure constraints.

“In late 2010 proposals for Postwick were significantly advanced. The scheme and associated development has planning permission and the design of the layout of the junction has been agreed by the Highways Agency.

“The Postwick Hub and the Northern Distributor Road are in the DfT Development Pool and the funding decision will be announced by the end of 2011. The NDR will be subject to a separate statutory planning process. The Postwick Hub can be delivered as a separate scheme and is not necessarily dependent on DfT funding ...

“The existing commitment of 1400 dwellings in the Sprowston Fringe can take place without improvement to Postwick Junction. Subject to acceptable improvements to Postwick Junction (Postwick Hub or a suitable alternative) there is significant potential for further development in the growth triangle before there is confirmation of the timing of delivery of the NDR.”

2.5 The suggested changes then show a possible level of growth, excluding a small exemplar at Rackheath, of 1600 units. That level of growth is based on a capacity study which must be subject to proper evidence-based investigation through the AAP process. BGD accepts this however as a holding position and therefore agrees with the suggested change which says: “Broadland District Council is committed to preparing an Area Action Plan (AAP) for the growth triangle. As part of the preparation of this AAP there will be an investigation of the potential to enable further growth over and above [1600 units] in advance of confirmation of timing of the NDR. This analysis would need to cover capacity of all local infrastructure (not just road capacity), the implications of particular sites, and the nature of development proposed. It will be essential that the growth is delivered in accordance with the overall strategy, taking into account its wider impact across the Norwich area, including a full range of infrastructure provision, services and high-quality public transport, walking and cycling.”

2.6 BGD is not convinced on the available evidence that the changes which suggest that... “Development beyond the pre-NDR threshold established through the AAP process will not be possible without a commitment to the NDR. If there is no possibility of the timely construction of the NDR, a complete review of the JCS would be triggered.” During the AAP’s evidence gathering and analysis BGD believes that it should be possible to establish whether or not there is a genuine robustness to the argument that only by having an NDR is sufficient road capacity released to implement the NATS-based provisions for cycling and public transport. In particular BGD would like to see the idea of an east-west ‘inner route’ or routes being explored both with regard to capacity and effective trip distribution, particularly given the high proportion of journeys along *any* east-west orbital route that are likely to originate or terminate within the growth area itself.

2.7 The existing proposals for the NDR result from a comprehensive programme of analysis and evaluation of options. There is unlikely to be another, hitherto unidentified, transport package for the Norwich Area in general and the Growth Triangle in particular which is both affordable and effective *and* which yields similar levels of additional traffic capacity to the NDR-based package. Rather, an approach will be required which depends less on creating new traffic capacity through major infrastructure and more on managing and redistributing capacity within existing and affordable new infrastructure. 2.8 BGD therefore takes the view that, to unlock further growth prior to the delivery of the NDR and full NATS, or in the event that there is no ongoing commitment to the NDR, the AAP will need to have regard to specific factors such as the following:

a. integrated land-use planning and distribution of uses within the GT to promote accessibility over mobility, to minimise the need to travel generated by new development, and significantly to reduce the number and proportion of journeys that are outside of cycling and walking distances or along routes not served by good public transport;

b. comprehensive modal split and modal shift targets which drive decision-making, encompass existing as well as new development and travel behaviour where appropriate, and recognise that compact cities like Norwich can achieve (and in many parts of northern Europe *have* achieved) sustained shifts in travel patterns over timescales akin to that covered by the JCS;

c. the potential delivery through phased development of an inner east-west cross route in an urban condition which enables east-west movement for local traffic, and for strategic traffic in advance of the delivery of the NDR;

d. cost/benefit comparison of infrastructure investment options including not only vehicular infrastructure but equally investment in public transport and infrastructure for cycling and walking;

d. demand-side measures (such as parking restraint and fiscal instruments) to mitigate unnecessary vehicular travel, help negate net traffic growth from new development and promote low-carbon vehicle use for essential journeys; and

e. area-wide sustainable travel planning across and beyond the GT to help promote a culture of walking, cycling and public transport use and to lock-in sustainable travel behaviour from first occupation.

3. Suggested changes IC2 and IC3: Policy 3 Energy and Water

3.1 BGD supports the rewording of the commencement of the policy statement (IC2)

3.2 The suggested changes in paras 5.13 to 5.18 are supported. BGD would, in particular, wish to support “ ... Development in the area will keep track with any current national standards relating to renewable or low carbon energy generation and the use of sustainable building technologies. In the meantime, schemes of a minimum of 10 dwellings or 1,000sqm of non residential floorspace will be required to submit (a) Sustainable Energy Statements demonstrating that provision is made for at least 10% of the development’s energy requirements to come from on-site renewable energy sources and (b) Sustainable Construction Statements showing that all viable and practicable steps have been taken to maximise opportunities for sustainable construction. In addition, the Sustainable Energy Statements for larger

developments will need to show that the scheme meets the maximum viable proportion of its expected energy requirements from decentralised and renewable or low carbon energy, making the most of any available local economies of scale. Combined heat and power [CHP] and district heating/cooling networks may be the most cost effective ways of achieving these economies. Greater Norwich Development Partnership will promote local energy generation through the establishment of Energy Service Companies (ESCOs), possibly with community ownership.”

3.3 There have been positive meetings between BGD and Anglian Water and both parties will ensure that their collaborative work will contribute to the development of the AAP.

4. Suggested change IC4: Appendix 8 (Monitoring Framework)

4.1 BGD has some doubts about the final point in the suggested statement – “[Present fifth row] – change first and third columns to read ‘All new housing schemes of a minimum of 500 dwellings to reach Code for Sustainable Homes level 4 for water on adoption and level 6 (also for water) by 2015’” and would prefer to see a conditioning few words along the lines of ‘if that code is adopted’.

4.2 While BGD supports the GNDP’s aspirations to reduce water consumption, its concern is that the Code, particularly at its higher levels, is over-reliant on *in situ* solutions on a house by house basis whereas BGD believes that site-wide measures are more appropriate and effective.

5. Suggested change IC6: Policy 4: Housing Delivery (Affordable Housing)

5.1 It seems eminently sensible to incorporate the first change into the JCS. So “[Second sentence] ‘Affordable housing needs, and the necessary mix of tenures, will be monitored regularly in the light of updated needs assessments for the plan area. If necessary the requirements of this policy will then be formally reviewed’” is supported by BGD.

5.2 Changes to FC2 and FC3 by replacing paras 5.28 (with subsections) and 5.29 is supported with caveats which are covered in 5.6 in this section (below). Thus “It is difficult to estimate needs for affordable homes over the long term to 2026. However, based on the most recent assessment of housing need in the three Districts, there could be a requirement for about 11,860 dwellings over the period 2008 to 2026 affordable homes with approximately 60% of these being social rented and 40% intermediate tenures. This is derived from the annual net requirement for new affordable homes extrapolated over the plan period and the backlog existing at the time of the housing needs assessment, with allowance made for the affordable housing provided up to the base date of this strategy. This represents just over 33% of the total housing requirement However, because of the expectation in Government guidance that current backlogs will be addressed early, the policy aim is to ‘frontload’ provision as much as possible, since the short term need for affordable housing is estimated to amount to 43% of overall provision. Regular monitoring of evolving need and provision will indicate whether or not this position has changed and may lead to a review of the policy.” Should BGD’s development programme be approved there is a strong likelihood that the build out period will bear a close similarity to the strategy’s timeframe. With that in mind it would seem sensible to test the viability of providing affordable homes at the point at which a detailed planning application is made for each phase of development. Since some phases will have more mixed uses than others there will always be good reason to test what precisely can be delivered and not just in finance terms. It therefore remains the case that BGD will always retain the aspiration to meet affordable housing targets at whatever level they happen to be set over the evolving plan period but it maintains that the watchword must always be ‘viability’.

5.3 “5.28B [text moved from previous 5.28B and amended] The assessment of housing need also indicates that the current split of affordable tenures to meet need in the short term, taking into account the current backlog, is approximately 85% social rented/15% intermediate tenures, with the greatest need for social rented accommodation related to the Norwich urban area. Any need to adjust this short term target to realign it with currently-estimated longer-term needs, will be considered as part of the monitoring and possible review process referred to above.” This change is supported insofar as it can be achieved through viability testing.



5.4 “5.28C The policy target is for sites of 16 dwellings or more to provide for 40% affordable housing, with tapering arrangements requiring 20% in schemes of 5-9 dwellings and 30% on sites for 10-15 dwellings. The Drivers Jonas Deloitte study 2010 and subsequent outputs of the model have shown a reasonable prospect that these requirements are likely to be viable (without grant) in a significant proportion of cases in various market scenarios which may prevail over the course of the plan period.” BGD considers this to be an overstatement. The DJD study was not sufficiently robust nor was it sufficiently clear enough to support the certainty in this proposed change. Please see 5.6 below.

5.5 “5.29 It is recognised that affordable housing provision through this policy is **dependent upon the overall viability of development** (BGD’s emphasis). In turn this depends upon a wide range of specific site circumstances. Where a developer suggests that site viability does not permit full provision at the level required by the policy this position will need to be demonstrated by an open-book process before any agreement is made to reduce the proportion of affordable homes and/or amend the mix of tenures. Where possible, this proves not to be the case financial contributions from any available public funds such as a grant from the Homes and Communities Agency (HCA) will be sought to bring marginal or unviable schemes to viability. In order to create mixed communities, affordable housing provided as part of a market development will be expected to be integrated within the site.” This is supported with the proviso that the circumstances in which it was framed have probably changed as explained below (5.6).

5.6 BGD strongly supports the intention to build and maintain mixed communities. It does, however, have difficulty in believing that there will be grant support of any kind in the period up to 2015 to support the levels of affordable housing in individual developments which the suggested changes propose. Under the terms of the Comprehensive Spending Review 2010 the arrangements for central support for affordable housing have changed significantly. From April 2011 registered providers –RPs - (formerly Registered Social Landlords) must recycle surpluses achieved by raising ‘affordable rents’ – those from new tenants in new build properties and relets – to up to 80% of open market rent levels. This is in lieu of grant. ‘Grant’ itself will be replaced by a top up for approved development plans for each RP with which a much slimmed Homes and Communities Agency will partner. If a RP fails to provide a surplus and recycle it, it will be ‘frozen out’ of the system for four years. Some £4.5bn has been set aside to build 150,000 affordable homes by April 2015. £2.5bn is already committed, through the phased out grant programmes, and the maximum that the residual sum can achieve per property required is £20,000. In these pending circumstances, BGD is more than ever convinced that viability testing and agreement on its methodology is essential to ensure that a proportion of all residential development is affordable.

Yours faithfully,

Jonathan Smales, Executive Chairman, Beyond Green Developments

