

Written Statement prepared by Andrew Martin Associates
on behalf of Goymour Properties Ltd in relation to the
Examination into the Joint Core Strategy

Matter 2

Does the JCS make sound provision for housing delivery?
(Policy 4 & Appendix 6: The Housing Trajectory)

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Introduction

1.1 These submissions are made on behalf of Goymour Properties Ltd and the Royal Norwich Golf Club in relation to Matter 2. AMA will not be giving oral evidence at the Examination as we have detailed our response to the Submission version (and also earlier versions) of the Joint Core Strategy (JCS). This written response seeks to respond to specific questions raised by the Inspector and therefore should be considered in conjunction with our earlier representations to the Submission JCS.

A: Is JCS's planned provision of housing land 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?

1.2 At the time the GNDP evidence was prepared the only Development Plan Document quantifying housing requirements was the then East of England Plan (EoEP). However, following the submission of the JCS the EoEP has been revoked in its entirety and the only interim guidance available in relation to establishing housing land supply is that provided by PPS3 and Communities and Local Government (CLG) letter dated 6th July 2010 concerning revocation of Regional Strategies (RS).

1.3 The historic importance of establishing a deliverable housing land supply remains as set out in PPS3 which advises that 'the Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.' This will be achieved by, amongst others, 'improving affordability across the housing market, including increasing the supply of housing.' This message is clearly being taken forward by the new Government as emphasised by the Minister for Housing and Local Government in his speech entitled the 'Age of Aspiration' (8 June 2010) within which he states 'if we are really serious about supporting peoples aspiration for home ownership, the real prize is we must build more homes.'

1.4 The CLG letter provides LPAs with interim guidance on how to continue to realise the above aims, in the form of a question and answer statement. With regard to determining housing provision in the absence of Regional Strategies Question 10 advises that the responsibility will rest with the LPA concerned. It advises that some LPAs may seek to retain their existing housing targets that were set out in the revoked Regional Strategies, whilst others may wish to review their housing targets. However, in the circumstances of the latter the statement is clear that the Government 'would expect that those authorities should quickly signal their intention to undertake an early review so that communities and land owners know where they stand.'

1.5 The statement continues to advise that LPAs will still need to justify the housing numbers in their plans and 'defend them during the LDF examination process. They should do this in line with current policy in PPS3' (Question 11). LPAs are also given the opportunity to revert to "option 1 numbers" (Question 12) however, any target selected may be tested during the examination process and 'authorities will need to be ready to defend them'. Further by virtue of Question 10, it is expected that those authorities who would revert to "option 1 numbers" should 'quickly signal their intention to undertake an early review'.

1.6 The GNDP has prepared a significant evidence base, more recently summarised in its housing topic paper, which sets out its approach to assessing housing need and quantifying housing provision. The GNDP has elected to proceed with the housing figures included within the now revoked EoEP. This is supported by our clients.

1.7 The revoked EoEP, which set a requirement of 508,000 net new dwellings between 2001-2021, represents in itself an underestimate of need. In fact this is acknowledged in the EoEP, which identifies that housing provision in the Plan should be seen as minimum

targets because the provision set out by Policy H1 falls significantly short of what is needed based on evidence (paragraph 5.5 of the EoEP).

- 1.8 The foregoing indicates that the revoked EoEP housing provision should be seen as an bare minimum when seeking to establish current housing provision in the JCS. The GNDP has recognised that there is chronic under provision in the EoEP the current thinking of the GNDP as concluded in the Topic Paper, a lower level of development could be artificially constraining housing delivery, with consequent impacts on economic development and housing.
- 1.9 The JCS approach is supported and, as demonstrated above, is consistent with national policy.
- 1.10 With regard to the status of garden land and the deletion of a national indicative minimum density, this will not directly affect the JCS. A number of greenfield allocations are to be released as part of the strategy. Further the Royal Norwich Golf Club is evidence of a number of greenfield and other available commercial/leisure land for development within the JCS administrative areas. With regard to the issue of density, the JCS seeks to deliver sustainable development which both makes efficient use of land and respects the character of the area in which it is situated. This will continue to be the case.

B: Is the JCS effective and clear about the mechanisms and timescales for achieving a supply of developable housing land for years 0-5 (and deliverable land for years 6-15) in the overall context of the 3 Councils' planned and programmed Local Development Documents (see para 53, PPS3)?

- 1.4 The housing trajectory sets out the timescales for achieving a supply of housing land for 0-5 and 6-15 years. However, concern is raised with regard to the mechanisms for achieving the supply that is forecast. It is considered that the Plan would benefit in increased flexibility to ensure that overall housing numbers are achieved.
- 1.5 As set out in our earlier representations, the deliverability of a minimum of 7,000 dwellings at Old Catton, Sprowston, Rackheath and Thorpe St Andrew in the Plan period is questioned.
- 1.6 Our representations set out our concerns with regard to accommodating that level of development within the land available, but also whether the quantum of development of development within the Growth Triangle can be delivered within the Plan period. The latter is explored below.
- 1.7 The Growth Triangle is a relatively small geographical area and all hinges on a joint and phased approach to infrastructure and housing delivery. In our experience there is a time lag of around 5 years between the submission of a planning application for a major strategic site and delivery of first dwellings. In this case we estimate that this would result in a first build year of 2016 at the earliest. This would require average annual completions of 636 dwellings in order to have built a minimum of 7,000 dwellings by the end of the Plan period.
- 1.8 We consider that this would be an unrealistic level of delivery and that in reality a maximum of 400 dwellings per annum would represent a more realistic estimate. It is our experience that even where there are a number of parcels being brought forward by multiple developers, this average rate of delivery is unlikely to be exceeded as developers will build in line with market demand. Allowing for slightly slower completion rates initially, we estimate that 4,150 is a more realistic estimate of housing delivery for a single allocated area within the Plan period.

Summary of the projected housing completions:

Year	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	Total
Completions required to achieve allocation	636	636	636	636	636	636	636	636	636	636	636	7,000
AMA estimate	200	350	400	400	400	400	400	400	400	400	400	4,150
AMA estimate of shortfall												2,850

1.9 Although the calculations above provide a relatively crude assessment, we consider that the maximum deliverable number of dwellings in the Growth Triangle is likely to be 4,000 dwellings by 2026.

1.10 We are therefore concerned that such a high level of development is proposed in this area when there are still so many uncertainties. We consider that delivery of the dwellings proposed within the Growth Triangle is unlikely to contribute to the supply of housing at the point envisaged. PPS3 recognises the importance of a planning for a flexible supply of land for housing and the need for deliverable sites for housing and we do not believe that this is currently achieved within the JCS by virtue of overreliance on the Growth Triangle.

1.11 We consider that it is imperative that a more flexible and responsive approach to housing delivery and phasing needs to be established within the JCS so that sufficient sites can be brought forward elsewhere within the NPA if the Growth Triangle building programme falls below the current estimates. A more flexible strategy which provides a better redistribution of growth to other areas in the NPA will provide greater certainty that the minimum housing targets will be achieved within the Plan period. We consider that the strategy is not effective and that there is a requirement for further contingency and flexibility within the strategy.

1.12 One suggestion that has been consistent throughout our submissions is the possibility to increase the growth aimed at the Norwich Policy Area (NPA) which is a focus for major growth and development in the JCS. To address the above it has been considered necessary to add further flexibility to Policy 9 of the JCS to include a provision which will allow a flexible reallocation and phasing of growth to meet the minimum housing delivery set out in the strategy.

1.13 We propose to add the following wording:

“Allocations in the Norwich Policy Area may include possible additions to address any shortfalls in delivery at the Growth Triangle. This will be subject to plan, monitor, manage approach in PPS3 and will contribute towards delivery of a minimum of 21,000 dwellings in the NPA by 2026.”

C: If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1.14 As identified above, we do not consider that all of the development proposed for the Growth Triangle can be achieved within the Plan period and therefore for the JCS to be “flexible” the policy must make adequate provision for an opportunity to re-distribute dwellings to other areas to maintain a consistent supply of dwellings during the Plan period.

1.15 We consider that the allocation for the Broadland NPA should be increased given that our client is promoting a deliverable and highly sustainable site at the Royal Norwich Golf Club, Hellesdon which will contribute to delivery of a significant number of dwellings (up

to 1000 alongside other community infrastructure) and can bring forward a significant level of local services and infrastructure by concentration of a sufficient critical mass of development.

- 1.16 In order to ensure that the JCS delivers a minimum of 21,000 dwellings in the Plan period and continues a rolling housing land supply we consider that the Broadland NPA should receive a potential further allocation in the order of 1,000 dwellings so that in the event monitoring of the JCS identifies slow rates of delivery in the Growth Triangle dwellings other sites in the NPA will continue to deliver, meeting minimum housing requirements.
- 1.17 We do not believe that this approach would undermine the strategy as the figure of 21,000 dwellings is the minimum number and not a ceiling to growth that cannot be exceeded. Therefore by placing a contingency of a further 1,000 dwellings in the Broadland sites within the NPA, and other areas as may prove necessary, the Council can provide a “flexible” strategy that will achieve minimum delivery targets. The GNPD can take great comfort from its Strategic Housing Land Availability Assessment (SHLAA) which demonstrates that there is a significant supply of housing land within the Broadland part of the NPA which could deliver in excess of 3,000 dwellings.
- 1.18 It is therefore our view that the Council should still seek a greater number of dwellings in the Broadland NPA, at least in accordance with the Council’s previous Option 3 (Regulation 25: Technical Consultation Stage). This will provide a “flexible” and thereby “effective” policy so that key decisions can be made at the next stages of the DPD process.
- 1.19 One suggestion that has been consistent throughout our submissions is the possibility to increase the growth aimed at the Norwich Policy Area (NPA) which is a focus for major growth and development in the JCS. To address the above it has been considered necessary to add further flexibility to Policy 9 of the JCS to include a provision which will allow a flexible reallocation and phasing of growth to meet the minimum housing delivery set out in the strategy.
- 1.20 We propose to add the following wording:
- “Allocations in the Norwich Policy Area may include possible additions to address any shortfalls in delivery at the Growth Triangle. This will be subject to plan, monitor, manage approach in PPS3 and will contribute towards delivery of a minimum of 21,000 dwellings in the NPA by 2026.”*
- 1.21 It is not considered necessary for further consultation or sustainability appraisal (SA) for these changes. The existing SA framework has tested high levels of growth within the NPA and the focussed changes are minor in proportion to the overall growth strategy. Therefore the impact on infrastructure etc will not be significant to warrant public consultation and SA. A SHLAA exercise has been undertaken and tested various growth scenarios across the NPA. This has demonstrated there is capacity to deliver a significant number of homes within existing social and environmental constraints.
- 1.22 Whilst we acknowledge that the JCS Examination is not necessarily the appropriate forum to consider detailed site proposals we do consider that it is necessary to provide such detail in relation to the representors site, the Royal Norwich Golf Club, Hellesdon (RNGC) in order to demonstrate that there are deliverable key sites in the Broadland NPA.
- 1.23 During previous stages of consultation Goymour Properties have demonstrated that the site is “suitable”, “available” and “achievable” for development in the Plan period and this has been recognised in the GNPDs SHLAA process. Following a series of meetings with officers’ at Broadland District Council, the promoters of the RNGC site have prepared an indicative Masterplan framework for the site which illustrates a development capable of accommodating up to 1,000 dwellings and associated social and community

infrastructure drawing ref: 08074/03c. (This site area has been subject of recent discussions with Broadland District Council and as indicative of expected delivery at this stage as the detail will be fixed in the next stages of the Site Allocations DPD but at this stage consider the above is deliverable.)

- 1.24 The site is deliverable within the Plan period. The landowners and the developers are committed to bringing proposals forward. Development will provide affordable housing in accordance with the Council's requirements. The site will also provide the only realistic opportunity of addressing existing recreation and local open space deficiencies in the area.
- 1.25 The existing Golf Club is a private Members facility with little or no public use. The RNGC members will relocate to Weston Park Golf Club, Hellesdon, Norwich which is just 11km from the site and in the ownership of Goymour Properties Ltd. The development of the RNGC site represents an opportunity to provide a meaningful contribution to green/open space to meet more than just the needs of the development itself but soak up existing open space deficiencies in the area and provide new public access. The illustrative concept Masterplan shows the commitment to retention of existing mature woodland/tree belts and creation of a network of green infrastructure throughout the site. There is also proposed to be creation of a community use/hub which may provide a community hall with outdoor sport provision. The proposals would therefore increase the provision of Natural and Semi Natural Greenspace, Amenity Open Space, Provision for Children and Young People and Outdoor Sport.
- 1.26 Finally, the site is in a highly sustainable location within the existing urban built form of Norwich, adjoining existing employment and residential development. The site lies in close proximity to a wide range of facilities and services. The site benefits from existing bus routes connecting the site with the City Centre and the railway station. The proposals would contribute towards public transport improvements, as necessary. Although this is a green field site, it is important to recognise that there is insufficient brownfield land to accommodate housing and therefore sustainable greenfield sites, such as this will come forward in the Plan period. The land also lies within Flood Zone 1 and therefore is not at risk from flooding.
- 1.27 Finally, policy 9 should not refer to the 2,000 dwellings to come forward from "smaller sites" within the Broadland part of the NPA as this is ambiguous. Whilst we are supportive of the identification of allocations here, it is not appropriate at this stage to predetermine the size of sites coming forward. The reference to "smaller sites" should be deleted as the document does not explain what is meant by this and this may result in confusion and potential delay in the preparation of subsequent DPDs. Further evidence on this matter is set out in our representations to the Submission Document. This minor change would not require any further consultation as the so called "smaller sites" have never been defined.