

Matter 3A – General strategy for the growth locations Cringleford Representor No. 8595

JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK

EXAMINATION

MATTER 3A – GENERAL STRATEGY FOR THE GROWTH LOCATIONS

FURTHER STATEMENT ON BEHALF OF THE TRUSTEES OF THE GURLOQUE SETTLEMENT, TRUSTEES OF NORWICH CONSOLIDATED CHARITIES, TRUSTEES OF ANGUISH'S EDUCATIONAL FOUNDATION AND THE TRUSTEES OF THE GREAT HOSPITAL



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1. OVERALL DISTRIBUTION OF GROWTH

- 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. 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 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.



- 1.5 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.
- 1.6 The levels of growth distributed to the main locations in the NPA are derived from a comprehensive evidence base. The planned provision of housing is required to respond to housing need and support the growth of the local economy. New development is focused upon key Norwich urban fringe parishes and at sustainable locations elsewhere in the NPA. Cringleford is an appropriate location for growth as it is part of the Norwich fringe, well related to existing public transport provision, services and facilities.



2. A DELIVERABLE PATTERN OF GROWTH

Developable Housing Land

- 2.1 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. 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.
- 2.2 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.
- 2.3 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.
- 2.4 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. New development at Cringleford will achieve a strong degree of interaction with the existing community/built fabric, placing new housing close to retail and recreation facilities. The growth will also deliver enhanced access to the Yare Valley to the benefit of existing and new residents.



3. JUSTIFIED GROWTH PROPOSALS FOR CRINGLEFORD

- 3.1 Policy 9 of the JCS indicates that the focus for major growth and development will be the Norwich Policy Area as defined in Appendix 4. Within this context, the JCS proposes a justified approach to new housing at Cringleford, well related to the significant employment opportunities at NRP, NNUH and UEA. Cringleford already benefits from good quality public transport and cycle links to the city centre and has good access to a range of services and facilities, including the Eaton District Centre.
- 3.2 The Spatial Vision of the JCS acknowledges that significant change will arise in the area covered by the Joint Core Strategy in order to accommodate new homes and jobs. The Vision anticipates investment at key employment locations, including Cringleford/Colney, which will help create a stronger economy. Sufficient land for employment development will need to be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. Objective 3 states that the Norwich Research Park will be a focus of further employment growth in the Norwich Policy Area.
- 3.3 The quality of land to meet the needs of business is one of the critical factors in ensuring economic success and attracting inward investment. The Joint Core Strategy provides the opportunity to secure a high quality offer of employment land to underpin the growth status of the Norwich area. In that wider context, Cringleford/Colney will be the focus of further housing and employment growth.
- 3.4 Policy 9 identifies the strategic role that Cringleford is expected to play in the accommodation of new housing and employment development in the period being covered by the JCS. The suggested housing provision is to be considered as the minimum number of dwellings to be delivered. We have noted the comment at paragraph 6.5 of the JCS that the strategic growth areas established at Policy 9 are in sustainable locations. Cringleford is an appropriate location for the accommodation of further housing and a significant increase in employment floorspace in this general area is part of a sound spatial strategy for the Norwich Policy Area.
- 3.5 Policy 9 refers to a significant expansion of activity at the University of East Anglia/Norwich Research Park. Greater Norwich is one of the East of England's engines of growth that will greatly contribute to the development of the wider economy. New employment, combined with further housing, represents an



appropriate response to the strategic location of this general area, adjoining the interchange between the A11 and the A47.

- 3.6 Paragraph 5.1 of Appendix 3 to the Topic Paper entitled 'Strategy to Accommodate Major Housing Growth in the Norwich Policy Area' states that Cringleford possesses a good range of social and community facilities. One of the perceived "principal advantages of this location is the proximity of residential areas to the existing and future research, health and education opportunities at the NRP, NNUH and UEA, as well as the high quality public transport and cycle links to the city centre." Whilst the scope for extensive development is confined by environmental considerations, growth at Cringleford can secure a high quality entrance into Norwich along this strategically significant corridor.
- 3.7 The delivery of the Joint Core Strategy should ensure that economic growth is facilitated and an adequate supply of housing land is maintained in the NPA, in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the NPA, the housing land supply in the short/medium term cannot be achieved purely by means of the development of previously developed land or by placing an unrealistic reliance on the delivery of a limited number of very large urban extensions. Medium-size development areas, at the very edge of Norwich, can be brought forward to accommodate new housing and employment opportunities in the short/medium term to ensure that the growth agenda for Norwich is not compromised in its initial phase. New housing at Cringleford is well related to key, strategic employment areas, and the proposed scale of growth reflects the output of the background studies.

Public Transport

3.8 The recognition of the strategic importance/significance of the Newmarket Road corridor will provide the opportunity to enhance the A11 approach to Norwich from the Southern Bypass. A development of this nature will enable significant improvements to be secured in public transport, walking and cycling links. The park and ride service along Newmarket Road is particularly successful. Policy 6 envisages a significant enhancement of public transport in the NPA which will include, inter alia, routes linking the City Centre to Cringleford/Norwich Research Park. Cringleford's position in the A11 corridor provides the opportunity to enhance public transport provision and support the concept of Bus Rapid Transit.



- 3.9 The Norwich Area Transportation Strategy proposed implementation plan at page 61 of the JCS highlights the accessibility of the Cringleford area. The strategically significant A11 corridor is related to the Thickthorn park and ride site, a core bus route, a bus rapid transit corridor with bus priority measures and adjoins the Thickthorn interchange where junction capacity improvements are envisaged.
- 3.10 We acknowledge the comments at paragraph 6.19 of the JCS that capacity improvements to the A11/A47 Thickthorn junction "are likely to require expansion of the existing Park and Ride site with improved access from the A11 northbound. Growth at Wymondham, Hethersett and Cringleford is dependent on significant enhancement to public transport infrastructure which will include Bus Rapid Transit if a viable route can be implemented." These considerations add to the appropriateness of Cringleford as a location for a strategically important urban extension.

Green infrastructure

- 3.11 An important aspect of growth at Cringleford is the potential to secure enhanced access to green infrastructure opportunities in the Yare valley. In conjunction with growth at Cringleford our clients can deliver land within the Yare valley to achieve the objectives/aspirations regarding green infrastructure.
- 3.12 Policy 12 of the JCS notes that "green infrastructure and links between currently fragmented habitats and to the rural fringe will be protected, maintained and enhanced." This will include, inter alia, the completion of a riverside and river valley walks "extending out into the surrounding countryside." Our clients own land in the Yare Valley off Keswick Road/The Loke and in the vicinity of Cringleford Wood/Gurney Lane. These areas could form part of the wider green infrastructure anticipated in Policy 10, delivered as an integral part of the Cringleford growth. In this way, a comprehensive strategy can be delivered in the Cringleford area to improve this strategically significant gateway to Norwich whilst enhancing green infrastructure, two key components of Policy 10 of the JCS.



4. EFFECTIVE GROWTH PROPOSALS: CRINGLEFORD

- 4.1 Cringleford can accommodate new housing and employment, thereby creating a distinctive gateway on the strategically significant approach to the centre of Norwich along the A11 corridor. It can contribute towards the achievement of a sound spatial strategy. Land either side of the A11 at Cringleford can make a meaningful contribution to the delivery of the new employment and housing required in the Norwich area. The creation of a high quality entrance to the Norwich urban area will provide a positive response to Policy 12 of the JCS which seeks an improvement to the 'gateways' to Norwich.
- 4.2 The existing suburbs of Norwich and the immediate urban/rural fringe "are key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the links between the city centre and the surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated approach in this strategy. The area contains a considerable and diverse employment base" (paragraph 6.30 of the JCS). Paragraph 5.10 of the JCS refers to the need to enhance the character, appearance, recreational potential and biodiversity value of the urban edge. Within this context, particular gateways are significant, being places where "landscape and townscape changes, such as where the countryside and urban area meet, or main entrances into the city centre and town centres."
- 4.3 Policy 2 seeks to ensure that development proposals will respect local distinctiveness, including the treatment of gateways. When the various spatial elements are combined, a sustainable policy outcome, supporting the objectives of the JCS, would be the identification of a gateway development off Newmarket Road, to the east of the Thickthorn Interchange. The A11 is the most significant strategic entrance into Norwich and could be the location for a high quality development, forming a logical extension of the development forms located between Colney Lane and Newmarket Road. The junction between the A11 and the A47 constitutes a clear strategic hub and the land either side of Newmarket Road could form part of the spatial strategic framework for the Norwich area, enabling the gateway concept described in Policy 2 of the PSD to be effected.
- 4.4 Paragraph 5.1 of Appendix 3 of the Topic Paper entitled 'Strategy to Accommodate Major Housing Growth in the Norwich Policy Area' notes that the A47 "Norwich



Southern Bypass has a major impact on the landscape" to the west of Cringleford and "severs some smaller areas of farmland adjoining the village from the surrounding countryside." The A47 has an impact on the landscape at the western approach to Norwich and the creation of a gateway development on either side of Newmarket Road at Cringleford will provide the opportunity to secure important visual enhancements as required in Policy 2.



5. INFRASTRUCTURE

- 5.1 GNDP documents TP 8, EIP 88, EIP 84 and EIP 85 describe the infrastructure elements deemed necessary to facilitate the delivery of the main growth locations established at Policy 10 of the JCS. Cringleford already benefits from the bus lane improvements on Newmarket Road described at paragraph 4.3 of EIP 88.
- 5.2 Paragraphs 5.3.1 5.3.6 of EIP 88 refer to the potential of a high frequency bus service along the A11 corridor which takes into account the demand arising from existing and future households. Further housing at Cringleford will contribute to the viability of such a service. The proposed growth locations and existing communities in the A11 corridor, in combination, provide a population base capable of supporting a high quality bus service.
- 5.3 EIP 84 identifies improvements to the Thickthorn interchange as a Priority 1 project related to growth at Wymondham, Hethersett and Cringleford. Given the location of Cringleford to the east of the interchange, and its relationship/accessibility by non car modes to key local employment areas and Norwich city centre, growth in this general area is not dependent upon physical enhancements to the Thickthorn junction. Further housing at Cringleford will place limited extra loading on the interchange as residents access places of employment at NRP, NNUH, UEA and Norwich city centre, all inside the A47 bypass alignment.
- Paragraph 2.2 of EIP 88 notes that the Norwich Area Transportation Strategy is founded on the principles of "enabling growth through the provision of sustainable development and increasing accessibility through widening transport choice." Paragraph 5.3.1 of EIP 88 states that the A11 corridor is currently well served by public transport "and the scale and location of development takes advantage of this existing provision." The Newmarket Road corridor already has a high level of bus priority and further housing at Cringleford can utilise and enhance that level of service. In addition, there are good cycle and public transport links between Cringleford and NRP/NNUH/UEA.