



**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 2 (A, B, C)

Date:
8th October 2010

Respondent Reference:
8203

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Bedford
Belfast
Cardiff
Dublin
Edinburgh
Glasgow
Leeds
London
Manchester
Newcastle-upon-Tyne



LRQ 400 3060

Bedford West One, 63-67 Bromham Road, Bedford MK40 2FG Tel: 01234 358863 Fax: 01234 271210
www.dpplp.com

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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 2

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?

Justified

2.1 Yes - The strategic housing targets identified at Policy 4 of the JCS stem from the now rescinded East of England Plan. Nonetheless, PPS3 is quite clear that when assessing the appropriate level of housing (para 32) Local Planning Authorities and Regional Planning Bodies, working together, should take the following into account:

- Local and sub-regional evidence of need and demand, set out in SHMA and other relevant market information.
- Advice from the National and Planning Advice Unit (disbanded) on the impact of proposals for affordability.
- The Government's latest published household projections and the needs of the regional economy, having regard to economic growth forecasts.
- SHLAA's
- The Government's overall ambitions for affordability
- A sustainability appraisal
- An assessment of the impact of development on existing and proposed infrastructure.

2.2 In the Topic Paper: Homes and Housing (TP4), the GNDP consider the housing targets within the JCS against the criteria identified above. Indeed the document provides an updated position from that considered at the time of testing the RSS (East of England Plan). This revised position clearly demonstrates that the level of growth required by the JCS is reasonable and justified. The majority of data available would in fact suggest that the JCS targets are modest (See Table 1 of Topic Paper). For instance, the GNDP Strategic Housing Market Assessment Stage 8 Report indicates that 38,650 dwellings would need to be delivered in the plan period to meet the identified need for affordable housing in the NPA (assuming that 33% is affordable). This level of growth exceeds the maximum allocation set by the JCS by

900 units.

2.3 It should however be acknowledged that the targets within the JCS do not allow for small scale windfall development within the NPA, which will inevitably make a sizable contribution to the overall provision of housing across the plan period. It is therefore considered that there is no need to increase the number of units allocated by the JCS, so long as sufficient flexibility exists to allow for additional growth where it is needed, on a windfall basis or as a part of a review of the development plan.

2.4 In preparing Topic Paper 4, the GNDP have provided robust and credible evidence to justify the strategic targets set out within the JCS, in accordance with the provisions of PPS3. The strategic housing targets identified by the JCS are therefore considered to be justified.

Effective

2.5 No – The JCS fails to effectively secure a continuous supply of housing land across the plan period, from the date of adoption. This issue is discussed in detail at Matter 2 (B) below.

Consistent

2.6 No – Although the strategic housing targets contained within the JCS are consistent with the guidance provided at paragraph 33 of PPS3, the JCS fails to effectively secure a continuous supply of housing land across the plan period, in accordance with paragraph's 53 and 60 of PPS3. This issue is discussed in detail at Matter 2 (B) below.

2.7 It is however considered that the recent changes to PPS3, in regard to the status of garden land and the deletion of a national indicative minimum density are consistent with the strategy for growth identified within the JCS. The JCS seeks to direct the large majority of development to large strategic sites which are highly unlikely to impact on garden land and would offer sufficient flexibility to ensure that adequate land can be provided to deliver the requisite number of dwellings at the most appropriate density (below 30dph or otherwise), whilst ensuring that land is used efficiently and effectively.

2.8 The policies of PPS3 in regard to garden land and appropriate densities would therefore need to be properly considered in the process of making site specific allocations of land and through the creation and application of Development Control Policies. These are not matters which would impact on strategic level policy making, such as the JCS.

B: Is the JCS effective and clear about the mechanisms and timescales for achieving a supply of deliverable housing land for years 0-5 (and developable land for years 6-15) in the overall context of the three Councils planned and programmed LDD's.

2.9 No - Paragraph 53 of PPS3 requires LPA's to set out in LDD's 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. The JCS is effective in identifying broad locations for growth, but it does not attempt to go further by identifying specific deliverable sites. Broad locations for growth should only be used by local authorities where it is not possible to identify specific sites and even then, should only contribute to years 11-15 (para 5 of PPS3). That said, the identification of specific deliverable sites is not the intended role of the JCS. It is for each individual authority to identify sites through their LDD's which are deliverable for years 0-5 and developable for years 6-10.

2.10 The JCS does not however factor in the period, following the adoption of the JCS, within which LDD's and specifically site allocation documents will need to be finalised and tested. When site specific allocations are adopted, it is likely that planning permission will initially be pursued for strategic growth locations via outline planning applications. This approach would allow for the growth locations 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. If it is the case that the Area Action Plans or SPD's are required for specific growth locations then this process would be further prolonged.

2.11 Accordingly, although there is no reason to doubt the delivery of strategic growth in

accordance with JCS allocations, there will be a significant gap in the early part of the plan period, within which 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.

- 2.12 The JCS must therefore plan for the early release of land, in addition to that which will come forward as a result of strategic allocations. It is considered that 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 1800 dwellings in South Norfolk (NPA) and 2000 dwellings in Broadland (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 as possible additions to named growth locations.
- 2.13 It is considered that by indicating where the aforementioned units should be directed, the JCS would offer sufficient certainty for a number of smaller sites to come forward in those locations, in advance of large strategic allocations, thus securing a continuous supply of housing whilst larger sites are properly planned and delivered.
- 2.14 Such an approach would also need to be factored into the housing trajectory at Appendix 6 of the JCS. At present, the trajectory envisages the delivery of 1,355no. dwellings from strategic growth locations in the monitoring year 2013/14. As discussed at para 2.10 above, this is considered to be extremely optimistic. At present Appendix 6 also indicates that smaller sites (within both South Norfolk and Broadland) are expected to deliver only 320no. units in the monitoring year 2013/14. It is however these smaller sites which offer the flexibility to come forward in the

short-term, as they are not constrained by the same land ownership, comprehensiveness and planning policy complications that will inevitably delay strategic growth.

- 2.15 For the JCS to be effective in securing a continuous supply of housing, it must therefore place greater emphasis on the delivery of new dwellings in the early part of the plan period. This can only be achieved by identifying locations in which smaller sites will be released and thus facilitating their delivery.

C: If the JCS is unsound in relation to general housing policy, are there any specific changes that would render it sound?

- 2.16 In order to maintain a flexible and responsive supply of housing land, in accordance with paragraph 60 of PPS3, greater clarity should be provided by Policy 9, to direct the 3800 dwellings allocated for smaller sites within South Norfolk and Broadland (NPA) to specific settlements. This approach would provide sufficient certainty for those smaller sites to come forward in the short-term, so as to meet any shortfall in supply, until such a time that large strategic sites begin to deliver units.

- 2.17 It is clear from the background evidence which supports the JCS that a number of settlements identified for growth, could in fact accommodate significantly more units (in a sustainable and appropriate manner) than have been allocated by the JCS. For example, the various Sustainability Appraisals, which have informed every stage of the JCS's preparation, have assessed a number of growth options, most of which sought to direct more development to settlements within South Norfolk than is proposed by the JCS. The table below provides a comparison between Option 1 (previously preferred approach) and Option 2+ (JCS preferred approach).

Location	Option 1	Option 2+ (JCS)
Hethersett	4,000	1,000
Wymondham	4,000	2,200
Costessey/Easton	2,000	1,000
Long Stratton	0	1,800
Total	10,000	6,000

- 2.18 In Hethersett, Wymondham and Costessey/Easton, the level of growth identified by Option 1 exceeds that proposed by the JCS (Option 2+). It is therefore interesting to note that the Pre-Submission Sustainability Appraisal considers 'Option 1' to represent the best performing approach, when considered against sustainability criteria (page 38). It is therefore quite clear that additional growth within these settlements can be accommodated in a sustainable and appropriate manner.
- 2.19 Within South Norfolk, it would therefore be reasonable and justified to distribute the 1800no. dwellings (allocated by Policy 9 for smaller sites) to Hethersett, Wymondham and the Costessey/Easton area. This would provide sufficient certainty to support the early release of smaller sites within these settlements and would not conflict with the evidence base upon which the JCS is founded. Indeed, Wymondham is classified by Policy 13 as a 'Main Town', whilst Hethersett is a 'Key Service Centre' (Policy 14) and Costessey is located on the periphery of Norwich (Policy 12). Accordingly, each of the settlements fall into categories to which the JCS seeks to focus new development.
- 2.20 It is also clear from the recently published South Norfolk 'Site Specific Policies and Allocations DPD' (Reg 25), that there are numerous smaller sites within the aforementioned settlements which could come forward for development (see maps at **Enclosure 1**). An example of this being land north of Great Melton Road in Hethersett (see location plan within Planning Overview at **Enclosure 2**) which has long been identified as the first phase of any future expansion to the settlement and is accordingly identified as 'Site 084' within the South Norfolk Site Specific Policies and Allocations DPD (see Map 46 at **Enclosure 1**). 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 discussed fully by the Planning Overview provided at **Enclosure 2**. A full set of technical documents (summarised by the Planning Overview) accompany the written statement prepared on behalf Country and Metropolitan Homes in respect of 'Matter 3, Part C'. These confirm that the land is available for early release in order to secure the continuous supply of housing, not only within the settlement itself but also the wider NPA.
- 2.21 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. 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.

2.22 In light of the evidence which has been provided in respect of land north of Great Melton Road (see para 2.20 and associated Enclosure), it is clear that at the very least, 200no. of the 1800no. dwellings should be directed 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. The table below does however provide a possible distribution scenario for South Norfolk, based on the level of growth explored by previous versions of the JCS.

Location	Proportion of 1,800	Total to Location (inc. strategic growth)	Comparison with option 1
Hethersett	650	1,650	- 2350
Wymondham	650	2,850	- 1150
Costessey/Easton	500	1,500	- 500
Total	1800	6,000	NA

2.23 The table above does not direct any additional growth to Long Stratton, on the basis that previous Sustainability Appraisals have questioned the credentials of the settlement to accommodate any growth, let alone the 1,800 already allocated by the JCS. The remaining settlements are by comparison acknowledged to be sustainable and would therefore most likely be the focus for the development of smaller sites in any event. Accordingly, there is no reason why the JCS should not take the opportunity to direct additional growth to these locations and therefore plan effectively for the continuous supply of housing sites across the plan period.

3.0 Conclusion

- 3.1 The strategic housing targets set out at Policy 4 of the JCS are considered to be justified and consistent with the provisions of PPS3.
- 3.2 Notwithstanding this, the JCS fails to effectively secure the continuous delivery of housing across the plan period, which is also a fundamental requirement of PPS3. The GNDP have acknowledged that there is an existing shortfall of committed sites to satisfy strategic targets within the NPA 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 in locations which are confirmed by the JCS to be sustainable.
- 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

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- Enclosure 2** Land north of Great Melton Road, Hethersett – Planning Overview (DPP)

Enclosure 1

South Norfolk Site Specific Policies and Allocations DPD (Reg25 Consultation) – Maps of identified sites 27a, 27b, 27c, 33, 46, 93 & 96

Enclosure 2

Land north of Great Melton Road, Hethersett – Planning Overview

