



Matter 3A  
General strategy for the growth  
locations  
Representor No. 8591

**JOINT CORE STRATEGY FOR BROADLAND,  
NORWICH AND SOUTH NORFOLK**

**EXAMINATION**

**MATTER 3A – GENERAL STRATEGY FOR THE  
GROWTH LOCATIONS**

**SUBMISSION ON BEHALF OF THE LEEDER  
FAMILY**

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## 1. OVERALL DISTRIBUTION OF GROWTH

### The Level of Housing Provision

- 1.1 The revocation of regional strategies by the Secretary of State on 6<sup>th</sup> July 2010 does not inevitably lead to a reduction in the planned provision of new housing (Appendix A). 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 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."* 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.
- 1.3 Paragraph 11 of PPS3 requires LDDs to be informed by a robust, shared evidence base, *"in particular, of housing need and demand, through a Strategic Housing Market Assessment and land availability, through a Strategic Housing Land Availability Assessment."* Sections 6 and 11 EIP 70 describe the information that can be gleaned from the SHMA and SHLAA.
- 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 (Appendix B).

**The main locations: Long Stratton**

- 1.6 Documents TP 8, EIP 84 and EIP 86 describe the development of the strategy to accommodate housing growth in the Norwich Policy Area. TP 8 acknowledges the difference in character across the NPA and the nature of the present settlement pattern.
- 1.7 A core strategy inevitably evolves over time as more information becomes available with regard to local issues and opportunities. TP8, 'Strategy to Accommodate Major Housing Growth in the Norwich Policy Area', notes at paragraph 3.2.3 that *"although not identified as a strategic employment location, Long Stratton also has a relatively strong employment base, including the offices of South Norfolk Council and Saffron Housing Trust."* Reference is also made therein to the *"successful employment area at Tharston Industrial Estate."* The Topic Paper also notes at paragraph 5.4 that Long Stratton *"has a wide range of retail and community facilities. The number of shops and services is already high for a settlement of this size, making it closer in function to a market town than most villages. With South Norfolk Council and Saffron Housing located in the village the employment base is also considerably larger than would normally be expected in a village of this size."*
- 1.8 The Topic Paper acknowledges that the provision of a bypass at Long Stratton *"is a priority"* and the range of services and employment at Long Stratton *"could be further*

*enhanced with the removal of much of the through traffic, particularly the high proportion of commercial vehicles.”* The Topic Paper notes that congestion in Long Stratton *“is likely to see it become the first air quality management zone in South Norfolk, which gives an indication of the potential health and environmental impacts of continued traffic through the village.”* This is a critical local issue addressed by the JCS.

- 1.9 The spatial strategy for Greater Norwich reflects the approach regarding local distinctiveness and place shaping to be found in PPS12. Local distinctiveness is a factor that evolves as the LDF process unfolds. It starts with an understanding of an area’s issues and opportunities, identifying those which are of local importance (paragraph 4.33 of PPS12). The relevance and implications of those opportunities will inevitably vary from place to place. Drawing out these distinctions is important as this will influence the extent to which the final plan embodies the concepts of place shaping and local distinctiveness.
- 1.10 The concept of local distinctiveness evolves through the LDF vision, describing the sort of place a local community wants its area to become. It is rooted in the aspirations of the Sustainable Community Strategy and by understanding what is required in the specific local context, the LDF can achieve a change in a settlement’s fortunes as part of a wider policy framework which reflects local issues.
- 1.11 Paragraph 9 of the PINS document ‘Examining Development Plan Documents: Learning from Experience’ states that *“the starting point for core strategies should be the identification of the critical issues that the council and its delivery partners are seeking to address.”* In identifying those critical issues, the document indicates that regard should be had to any SCS. The PINS guidance advises that *“the core strategy should focus relentlessly on the critical issues and the strategies to address them.”*
- 1.12 The South Norfolk SCS states that *“a Long Stratton bypass is a high priority to reduce the effects of traffic”*. This is a critical issue for the local area/community and has a direct impact upon the way in which local people perceive the future shape of the area. The PINS document clearly acknowledges that *“the whole point about a locally distinctive core strategy”* is that it seeks to address local critical issues.
- 1.13 The JCS establishes local priorities to fashion the type of place reflective of all community aspirations. It determines what the emphasis should be in different parts

of the Norwich Policy Area which is not homogenous in terms of economic or social geography. The JCS has evolved to provide a policy base whereby the level of growth can be harnessed to meet local objectives. The approach is to use growth in support of regeneration, recognising that different parts of the NPA have very different characteristics, functions and needs. Each settlement has its own role to play in delivering a coherent strategy which is capable of addressing and resolving local issues. The Joint Core Strategy gives South Norfolk Council the framework within which to deliver its place-shaping responsibilities.

### **Housing Land**

- 1.14 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. The new development areas must exhibit a strong degree of interaction with the existing communities/built fabric.
- 1.15 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. THE PATTERN OF DEVELOPMENT**

- 2.1 Since a core strategy is meant to focus relentlessly on critical issues, and the delivery of a bypass at Long Stratton is identified as an important matter requiring local action in the SCS for South Norfolk 2008-2018, the Joint Core Strategy necessarily provides a spatial planning response to the delivery of a bypass at Long Stratton, harnessing a growth dynamic focused upon Greater Norwich. Local communities perceive the level of growth as providing the means to address critical issues impacting upon them. A locally distinctive core strategy will deal with such considerations and, as a consequence, will not have the same format as core strategies elsewhere.
- 2.2 The GNDP and the Leeder Family are committed to delivering a bypass in conjunction with the growth envisaged for the settlement in the Joint Core Strategy. Landowner contributions will be available to secure other elements of community infrastructure of benefit to the settlement. Further local employment opportunities will be created as part of the growth agenda and this will stimulate enhanced self-containment.
- 2.3 Policy 10 of the JCS requires growth at the development locations established at Policy 9 to achieve a high level of self containment while integrating well with neighbouring communities. Local environmental conditions at Long Stratton will be substantially enhanced by the provision of the bypass. The planned expansion will achieve a revitalised central area, deliver improved services/facilities and shape a cohesive settlement that is not divided by the A140.

### **3. TRANSPORTATION**

- 3.1 The vision for Long Stratton is integrated with key aspects that will deliver sustainable growth. In terms of transportation this relates to the provision of enhanced public transport with associated bus priority in the A140 corridor and a bypass. Public transport for the enhanced settlement will be the focus of an upgraded core bus service delivering a 15 minute daytime service to Norwich. There is also potential for Long Stratton to become a hub for its wider community as part of its status as an emerging market town and this could generate a need and market for local bus services in the future.
- 3.2 In common with other growth locations, Long Stratton currently supports good existing public transport services which are intended to be used as solid foundation for the enhanced services.
- 3.3 In appendix C we have examined the 2001 Census travel to work statistics as a source of information on travel to work for existing residents that records where they work and how they travel. We consider this reflects that there is already a strong culture of public transport use in Long Stratton for out-commuting to Norwich as the key workplace destination. It shows that existing services that offer 2-3 buses in the peak periods are used by residents as a reasonable alternative to the private car for commuter journeys to Norwich City Centre. This is supported by GNDP in their NATS Implementation paper (EIP 87) where it is accepted that Long Stratton can deliver an enhanced core bus service. These direct bus services in the A140 corridor are supplemented by the existing park and ride at the A140/A47 Harford interchange which clearly plays a role in delivering a service into Norwich for residents in the A140 corridor, including those from Long Stratton.
- 3.4 In overall terms, the importance of self-containment is also highlighted by Census data which shows 65% of all jobs in Long Stratton are filled by local residents and overall containment is 31%. The Vision for Long Stratton would reinforce the provision of local employment.
- 3.5 We believe this supports the evidence that the baseline travel position can be improved upon sustainably by supporting growth with improved services and facilities. This does not preclude Long Stratton as a suitable location for growth when considered with the other local advantages that growth will bring. There is not only simply the addition of patronage for public transport from growth, but also the

ability to attract existing residents in Long Stratton and other communities on the A140 corridor through the associated improvements in public transport.

- 3.6 Development in Long Stratton relates inextricably to the provision of the bypass to the settlement removing the existing severance. The planning permission for the NCC promoted bypass lapsed in July 2010. The bypass permission was not renewed on the basis that public funding was extremely unlikely to be forthcoming. However, NCC's commitment to the bypass remains firm but the strategy to deliver this key element of infrastructure is now linked to development. The advantage in this strategy is that a bypass planned with development will be contiguous with a whole settlement approach to master planning that fits with the Vision for Long Stratton and intended AAP. The Leeder Family would advocate a development and bypass scheme that is delivered under a single planning application, by a single landowner/developer, with a specification that delivers the strategic benefit of a bypass. The emerging spatial package for Long Stratton and LIPP makes reference to the new development related bypass being £20m, reflecting a bypass that is specified with development, yet still fit for purpose, and is delivered in parallel to housing.
- 3.7 The LIPP and GNDP statement on matter 3A clearly indicate that the Long Stratton bypass is a critical dependency for growth in Long Stratton. However, growth in Long Stratton is not reliant on the overarching dependencies for growth overall which GNDP identify as being the NDR and Thickthorn interchange. In terms of delivery this means that Long Stratton has inherent flexibility and can come forward earlier and independently of these critical elements of infrastructure.

**APPENDIX A**

## A FLEXIBLE SUPPLY OF LAND FOR HOUSING

### Government Housing Objectives

- A.1 The Minister for Housing and Local Government told the RICS in London on 8<sup>th</sup> June 2010 that *“if we are really serious about supporting people’s aspiration for home ownership, the real prize is we must build more homes.”* He noted that it was necessary *“to build more homes and entrench sensible lending practices so that, in the long run, houses will become more affordable.”*
- A.2 The Government published the third edition of PPS3 on 9<sup>th</sup> June 2010. PPS3 sets out the national planning policy framework for delivering the Government’s housing objectives. Those objectives have been developed in response to recommendations in the ‘Barker Review of Housing Supply’ and a principal aim of PPS3 is to underpin the Government’s response to that Review and the necessary step-change in housing delivery, through a more responsive approach to land supply at the local level. Paragraph 10 of PPS3 states that the planning system is expected to deliver *“a sufficient quantity of housing taking into account need and demand and seeking to improve choice.”*
- A.3 On 24<sup>th</sup> June 2010, the Secretary of State for Communities and Local Government was asked in Parliament what guidance his Department provides to Councils *“on assessing levels of housing need in their area.”* In a Written Answer, the Parliamentary Under Secretary of State stated that PPS3 *“and the Strategic Housing Market Assessment Practice Guidance can assist local authorities on how to assess the level of housing need in their area.”* He noted that the Secretary of State had issued a letter dated 27<sup>th</sup> May 2010 and observed that *“decisions on housing supply will rest with local planning authorities without the framework of regional numbers and plans.”*
- A.4 Paragraph 32 of PPS3 requires that the level of housing provision should be determined by taking an evidence-based approach. In seeking to understand the level of housing required, local planning authorities are expected to take into account *“evidence of current and future levels of need and demand for housing and affordability levels”* based upon local information set out in strategic housing market assessments and the Government’s latest published household projections. Furthermore, the assessment of an appropriate local level of housing is also

expected to take into account the Government's overall ambitions for affordability across the housing market, *"including the need to improve affordability and increase housing supply."*

- A.5 The Secretary of State indicated on 6<sup>th</sup> July 2010 that the Government is *"committed to housing growth."* Imposed *"central targets will be replaced with powerful incentives"* and he has confirmed that this will ensure that those local authorities *"which take action now to consent and support the construction of new homes will receive direct and substantial benefit from their actions."* These incentives will encourage communities *"to increase their aspirations for housing and economic growth."*
- A.6 CLG's Chief Planner wrote on 6<sup>th</sup> July 2010 to all chief planning officers about the revocation of regional strategies. Attached to his letter is guidance following that revocation, noting that local planning authorities should continue to develop core strategies and present evidence to support their approach. The examination process will continue to assess the soundness of DPDs and *"Inspectors will test evidence put forward by local authorities and others who make representations."* Local planning authorities are expected to *"collect and use reliable information to justify their housing supply policies and defend them during the LDF examination process. They should do this in line with current policy in PPS3."*
- A.7 On 9<sup>th</sup> August 2010, the Minister for Housing and Local Government wrote to all local authorities on the issue of the 'New Homes Bonus' scheme. In that letter, the Minister states that *"the Coalition Agreement makes a clear commitment to providing local authorities with real incentives to build new homes. These incentives will directly reward councils for new homes built, and we will be consulting on the detail later this year. Because we are committed to housing growth, introducing these incentives will be a priority and we aim to do so early in the Spending Review period."*

**APPENDIX B**

## **FUTURE HOUSING REQUIREMENTS**

- B.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. However, Appendix 6 of the JCS does provide an indication of the anticipated delivery of new housing on an annual basis in the period 2001-2026. The GNDP paper entitled ‘Five-Year Supply of Housing Assessment-Base Date 1<sup>st</sup> April 2009’ states that, at that stage, there was a supply of 3.76 years in the Norwich Policy Area.
- B.2 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. The GNDP assessment of the five year supply of housing describes the administrative actions that need to be undertaken, with particular reference to paragraph 71 of PPS3.
- B.3 Policy 4 of the JCS states that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to secure a framework to accommodate housing in the period 2008-2026. 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.
- B.4 Paragraph 33 of PPS3 refers to the process of determining an appropriate level of housing. One of the issues to be taken into account is the Government’s latest published household projections. The 2006-based household projections were published by CLG in March 2009 and suggest an increase of 114,000 households in Norfolk in the period 2006-2026. By way of comparison, the housing provision established in the revoked East of England Plan for Norfolk anticipated the construction of 83,120 dwellings in the period 2006-2026. Thus, the Government’s most recent household projections anticipate a significant increase above the dwelling requirement previously to be found in the East of England Plan.

B.5 The revoked East of England Plan anticipated the construction of 40,000 dwellings in Broadland/Norwich/South Norfolk in the period 2006-2026. The 2006-based household projections suggest an increase of 48,000 households across the GNDP area in the period 2006-2026. As with Norfolk as a whole, the latest household projections for the GNDP area suggest a housing requirement figure greater than that described in the tabulation at page 43 of the Joint Core Strategy.

**APPENDIX C**

### **Existing Public Transport Mode Share for Long Stratton Residents**

- C.1 As a basis for understanding the potential mode share for bus use the existing travel patterns exhibited by residents of Long Stratton from the 2001 National Census travel to work statistics have been considered.
- C.2 This is specifically travel to work, not all travel, but in so doing represents the existing travel to work profile of residents. For obvious reasons, commuting to work is a key focus in terms achieving mode shift due to the time of day it takes place, the number of trips involved and resulting impact on congestion.
- C.3 Whereas, local commuting trips within the expanded settlement of Long Stratton would be the target for mode shift to walking and cycling. The key out-commuting workplace destination is Norwich and is already a focus of existing public transport on the A140 radial route that will be improved in the future.
- C.4 For Long Stratton residents the census records the key work place destinations as Long Stratton at 31%, the remainder of South Norfolk as 22% and Norwich at 30%. The majority of travel to Norwich is to the City centre which is 21% of the total. Norwich and South Norfolk therefore make up 74% of all workplace destinations for Long Stratton residents. Of these key workplace destinations, public transport services are currently well supported to Norwich and destinations in the A140 corridor.
- C.5 In terms of the market for public transport and for out-commuting specifically, Norwich accounts for around half of all out commuters from Long Stratton (30% of the 69% out-commuting) and the mode share for public transport for residents travelling to Norwich is 15% overall. The City centre is the focus of the majority of out-commuting and the mode share is higher at 21%.
- C.6 Within Long Stratton there is unsurprisingly a high number of residents walk and cycle to work which stands at 36%.