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

Matter 3

Strategy and locations for major growth in the NPA (policies 9 and 10, and Appendix 5), including consideration of related access & transportation issues (policy 6) and other infrastructure issues

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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 3. Andrew Martin Associates 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.

A3: What flexibility exists within the overall strategy to accelerate/defer development in particular locations if circumstances make this necessary? Is the JCS sufficiently clear on this point and how such flexibility would be achieved?

- 1.2 As set out in our response to Matter 2, we raise concern in relation to the ability of the Growth Triangle to both accommodate and deliver the quantum of development proposed in the JCS. We do not consider that the Plan, as currently drafted, provides sufficient flexibility for sites within other areas to come forward.
- 1.3 We submit that it would be prudent to introduce flexibility into the document to allow greater numbers of dwellings to come forward in areas, such as the Broadland part of the NPA. However, as currently drafted the JCS contains flexibility under Policy 9 (Strategy for Growth in the Norwich Policy Area) as it recognises that all of the numbers expressed in the Policy are minimums and therefore an area could exceed the stated allocation, particularly if circumstances result in delays to housing within other parts of the JCS.
- 1.4 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 RSS housing targets will be achieved within the Plan period to 2026. We consider that the strategy is not effective and that there is a requirement for further contingency and flexibility within the strategy.
- 1.5 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.
- 1.6 We propose to add the following wording to policy 9:

"The Norwich Policy Area (NPA) is the focus for major growth and development. Housing need will be addressed by the identification of new allocations to deliver a minimum of 21,000 dwellings distributed across the following locations:

- ...[....].....
- Broadland sites in the NPA: 2,000 (rising to 3,000 if required) dwellings;
- 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.

