Towards A Strategy – Greater Norwich Development Partnership 29th January 2019

Recommendation

It is recommended that the Board endorses the proposed approach set out in this report as the basis for developing the planning strategy for growth for the Draft Greater Norwich Local Plan (Regulation 18) to be consulted on in Autumn 2019.

1. Introduction

1.1. This report proposes a high-level planning strategy to guide the preparation of the Regulation 18 draft of the Greater Norwich Local Plan (GNLP) due for consultation later this year.

1.2. In June and September 2018 the Board considered feedback on the Growth Options consultation which included several questions related to strategic issues. Members are invited to refer to these reports.

1.3. A primary purpose of a local plan is to provide a planning strategy for the pattern and scale of development. This strategy must be illustrated on a key diagram. The proposed strategy set out in this report takes account of economic growth potential, housing need, protection and enhancement of the environment, national planning policy requirements, regional economic issues and consultation feedback.

1.4. The proposed strategic distribution of growth is a starting point to guide more detailed work on the draft GNLP. This further work will include more detailed analysis and investigation including: infrastructure needs assessment; Habitats Regulations Assessment (HRA) considerations; and, Sustainability Appraisal (SA). Subject to the outcome of this more detailed analysis and investigation, it may be necessary to amend the strategy. Any amendments will be reported to members as required.

1.5. This report discusses two types of flexibility. In the first instance the strategy outlined in the report is intended to provide a reasonably broad guide at this time, rather than being definitive, as it will need to provide the opportunity to flex through the plan making process as further evidence is gathered and sites are appraised. Secondly, the GNLP, when adopted, will need the flexibility to support economic growth and the delivery of housing need, by providing additional growth opportunities through delivery buffers, windfall and contingency sites.

1.6. Member support for this broad strategy will enable more detailed work on site selection to be undertaken. This will allow consultation to take place to timetable on the draft GNLP in Autumn 2019. The draft plan will include the strategy, site allocations and area wide policies for the period to 2036. Existing local plans mainly plan to 2026.

2. Employment

2.1. The National Planning Policy Framework (NPPF) requires local plans to set out an economic strategy.

2.2. Evidence suggests that the Greater Norwich economy has grown by around 20,000 jobs since 2008 (the Joint Core Strategy base date) and 30,000 since 2011 (the low point after the recession). Providing the right sites in the right places for sectors with the greatest economic potential will support continued growth and a vibrant economy.

2.3. Local evidence has shown that the total amount of allocated and permitted employment land is more than sufficient to provide for expected and promoted growth. There may be a local need for some new small-scale allocations to provide for jobs growth in towns and villages, providing local job opportunities and supporting a vibrant rural economy.

2.4. Evidence demonstrates that existing strategic employment locations in Norwich City Centre, the Norwich Airport area, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park (NRP), Wymondham/Hethel, Longwater and the Food Enterprise Zone have the potential to support jobs and businesses in the key growth sectors identified in the Norfolk and Suffolk Economic Strategy (NSES). The strategic employment areas are generally supported by good quality infrastructure and nearby housing, either existing or planned.

2.5. These strategic sites also support the Cambridge Norwich Tech Corridor initiative – supporting a globally significant axis between the Cambridge University and UEA/NRP. The Tech Corridor links to two nationally significant growth corridors: London-Stansted-Cambridge and the Cambridge - Milton Keynes-Oxford Arc (CaMkOx). The Greater Cambridge Partnership identifies all these areas including the Cambridge Norwich Tech Corridor for "360 degree" collaboration to meet substantial growth potential.

2.6. Government funding will be linked to the delivery of the NSES and the forthcoming Local Industrial Strategy. Supporting and demonstrating a link to nationally significant growth corridors will assist in attracting inward investment and accessing funding opportunities.

3. Housing

3.1. The Government recently consulted on a revised methodology for deriving local housing need. This gives an annualised need of 2,066 homes per annum. While the methodology is still at consultation, and the figures are draft, experience suggests that it is likely to be confirmed as the standard approach.

3.2. Using the Government's consultation version of the standard methodology for calculating housing need, and re-basing the figures to 2018, suggests that the **housing need** to 2036 is **37,200 homes**.

3.3. The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement.

3.4. To provide for general uncertainty (such as delayed or slow delivery, and fallout of permissions), a delivery buffer of 10% was proposed for last year's Growth Options consultation. Applying a **10% delivery buffer** would give a plan requirement of **40,900 dwellings.**

3.5. **Existing commitment** in April 2018 was **34,100** homes.

3.6. So new sites need to be identified for at least **6,800 homes** (40,900 -34,100). This figure is very close to the 7,200 additional homes consulted on in 2018. Continuing with a target for allocations of **7,200 homes** provides a slightly larger buffer of 11%.

3.7. The Government encourages authorities to consider higher levels of growth. Windfalls provide additional potential delivery. GNLP policy will support appropriate windfall development, including small scale sites in villages. Further work is underway to assess the potential scale of windfall development and the current assumption is in the region of **5,000 dwellings**. By definition, some level of windfall will happen; demand will determine whether it is instead of, or in addition to, allocated growth. Our overall approach, including to windfalls, builds in flexibility to support higher than trend economic growth incorporating the City Deal.

3.8. The deliverability of currently committed sites will be subject to scrutiny through the local plan examination. Work is ongoing to assess this and it is likely that it will not be possible to demonstrate that all the existing commitment will be delivered before 2036. At this stage it would be advisable to consider potential contingency sites should these prove to be required (see table 1 below).

4. Strategy for the distribution of growth

4.1. The current commitment of housing and employment land is large and will shape the GNLP strategy. All the existing allocations, including Area Action Plans, derive from the current Joint Core Strategy (JCS). These allocations have been demonstrated to be sustainable and, except for some small sites where delivery is unlikely, it is proposed that they will be carried forward in the GNLP (N.B. as indicated in 3.8 above evidence may suggest that some delivery of existing allocations could take place after 2036).

4.2. Most committed growth is focussed on our major economic assets, extending on a north east to south west axis from the Broadland Growth Triangle, through the Norwich urban area to the A11 corridor, including Hethersett and Wymondham. The proposed strategy for the GNLP will expand on this existing approach to provide for more growth in market towns and villages across the area to support vibrant rural communities.

4.3. The Growth Options consultation identified six reasonable alternatives for the distribution of the additional growth needed in the GNLP. All the options included some growth in villages in the "baseline". Based on sustainability appraisal work, the consultation document concluded that options with more dispersal are more likely to address the draft plan objective to deliver homes and would increase social sustainability in rural areas by providing opportunities for people to continue to live in villages. More concentrated options perform better in relation to plan objectives that seek to improve air quality, reduce the impact of traffic, address climate change issues, increase active travel and support economic development. However, it is recognised that the impacts on air quality and climate change should begin to moderate with the increasing roll out of electric vehicle technology. The majority of consultees who expressed a view supported the more concentrated options (i.e. Option 1 *Concentration close to Norwich;* Option 2 *Transport corridors; and* Option 3 *Supporting the Cambridge-Norwich Tech corridor)*, although there was also some support for village development.

4.4. The Growth Options consultation made it clear that *"the strategy chosen for the … plan in 2019 may be an amalgam of the options. The options aim to provide a framework for considering different strategic approaches".* Since that consultation evidence and context continue to evolve, for example, the NPPF has been released and the Britvic/Unilever site has potentially become available.

4.5. Based on national policy requirements, sustainability, local evidence and consultation feedback, the proposed strategy in this report combines three key elements of the Growth Options i.e. urban concentration; dispersed growth to sustainable locations in more rural parts; and, supporting the Cambridge Norwich Tech corridor. The following principles for developing the preferred strategy for the distribution of the additional growth to 2036 are proposed:

a. Maximise brownfield development in the Norwich urban area. The availability of the Britvic/Unilever site will be significant, although the potential for housing and/or employment uses on the site is unclear at this time. The potential Secretary of State call in of the recent decision to grant planning permission for over 1,200 dwellings at Anglia Square adds further uncertainty;

b. The plan making process requires **reasonable alternatives** to policies to be tested. The six Regulation 18 Growth Options are the main reasonable alternatives and there will also be some more detailed alternatives to the preferred approach. These include consideration of the larger sites listed in table 1 below and/or differences in the ranges within Main Towns and Key Service Centres for example;

c. To demonstrate that the approach is sustainable and deliverable, the scale of growth needs to broadly follow the settlement hierarchy already consulted on as this reflects access to services and jobs;

d. In line with Government advice, to maximise delivery only a limited number of new very large sites (500+) should be considered and only allocated where delivery can be demonstrated;

e. No new settlement is proposed at this time as: a significant proportion of the existing commitment is already on large sites; a significant number of smaller sites have been submitted which, if sustainable, can provide a more balanced range; and, the establishment of any new settlement is likely to take a long time. However, the situation could be kept under review, taking particular account of evidence that can demonstrate delivery. A location could be promoted for the future if it is considered to be an appropriate long-term option;

f. HRA issues suggest that housing locations at a greater distance from key internationally important habitats, such as those in the Broads, are likely to have less impact;

g. Demonstrating support for the Cambridge Norwich Tech Corridor and its employment sites suggests some additional growth in Wymondham, Costessey, Cringleford, Hethersett and/or Little Melton;

h. As well as looking at smaller villages and clusters, dispersal to rural areas implies reasonable levels of growth in the towns and service centres to support the rural economy. Some of our Key Service Centres have larger commitments than the Main Towns of Aylsham, Diss and Harleston and this balance will need to be considered;

i. The impact of small sites: the NPPF requires 10% of allocated dwellings on sites of 1 hectare or less, but also does not allow affordable housing to be required on sites of 10 homes or fewer. Therefore:

    - to deliver affordable dwellings, wherever possible the GNLP should have no new allocations less than 0.5 hectare or around 12-15 dwellings. This minimum allocation size will reduce the total number of allocations and therefore reduce plan preparation time;
    - A significant number of small allocations will be required in the range 0.5 to 1 hectare to meet the 10% requirement. They will need to be found in upper tiers of the settlement hierarchy as well as in smaller villages;
    - Small sites, including less than 0.5 hectare, will also be provided for by policy to encourage windfall, either through application or neighbourhood plans.

Infrastructure and constraints

4.6. Detailed discussions on infrastructure impacting on sites and locations are ongoing. Dispersed development will still need to consider cumulative impact and potential mitigation on higher order infrastructure and environmental issues, most particularly in relation to the HRA.

The proposed growth strategy

4.7. The proposed distribution of growth strategy outlined in table 1 below takes account of the above principles, the scale of existing commitments and a high-level assessment of the sites proposed so far. The scale of potential new allocations is intended to give a broad indication at this stage, to help site selection and to understand possible constraints and infrastructure issues. The numbers against individual areas/locations add up to more than is required as it is necessary to maintain flexibility at this stage in the development of the draft GNLP.

Table 1 The proposed strategy for the distribution of growth

Area	Indicative scale of New allocations	Location	Comments	Commitment (2017)
Norwich City area	**2,500**	Majority in East Norwich	Increased from the Reg 18 base of 1,500 to take account of emerging brownfield opportunities e.g. Archant and Britvic/Unilever	7,000
North East	**200**	Thorpe St A.	Some brownfield opportunities	360
		Sprowston		20
		Rackheath	Potential smaller sites and uplift in existing allocations. But need to consider how much could be delivered in plan period or post-2036?	NEGT as a whole = 12,500
North North/West	**500-800** (range reflects wide choice of potential sites)	Drayton	**100 additional** already permitted (0271 and David Rice) Possible uplift on current allocation	280
		Hellesdon	A range of various sites across the four parishes	1380
		Horsford		280
		Horsham and Newton St Faiths		60
		Taverham		10
South West	**600**	Costessey	Possible large site not included here	710
		Easton	Possible uplift within existing allocation	900
		Cringleford	Scope for uplift in land identified in NP	1460
		Hethersett	**c100** uplift in current allocation	1300
		Lt Melton	Possible small scale sites	70
Total 3,800 to 4,100				
Towns and Key Service Centres	**1,200 - 1,500+**			
Towns 900-1,000+		Aylsham Diss Harleston Long Stratton	**Each of the towns have a range of potential sites** Significant capacity in existing allocation, but need to consider scale of additional delivery before 2036?	350 320 160 1970

		Wymondham	Small allocation to take account of existing commitments? (Possible large site not included here)	2680
KSCs 400-600		Acle		210
		Blofield	Large existing commitment suggests very little additional	460
		Brundall	**150** recent permission	30
		(Hethersett)	(under South West above)	
		Hingham		50
		Loddon and Chedgrave		210
		Poringland/FE	Large existing commitment suggests very little additional	580
		Reepham		170
		Wroxham	Constraints suggest more limited potential	30
Village Clusters	**2,000**	Specific locations will be the subject of further analysis		
TOTAL 7,000 to 7,600				
<u>Contingency</u>				
Large-scale sites for testing as possible alternatives or contingency sites		Taverham	**c1,500** dwellings extension to the north of Thorpe Marriot	
		Costessey (largely in Bawburgh parish)	**c1,000** dwellings on site(s) south of Lodge Farm, west of Bowthorpe	
		Sprowston	**c1,200** dwelling site adjacent to current White Woman Lane development in NEGT could be allocated, but assume no net impact on NEGT delivery pre-2036 given current commitment in the area	
		Wymondham	**c1,000** dwellings at North East Wymondham And/or similar scale to the south of the town	
		Honingham	**New settlement proposal (rising to 7,500)** proposed by an RSL, and with more evidence, giving more certainty about delivery than alternative new settlements	

Illustrating the distribution of strategic scale growth

4.8. The local plan will need to illustrate the distribution of growth – both new growth and commitments carried forward.

4.9. To support rural life, provide more choice and improve delivery of homes, it is proposed that the GNLP will provide for higher levels of growth in appropriate locations, including villages, across the plan area. However, reflecting the existing housing and employment commitments, and elements of the proposed strategy, the main concentration of growth is located in an area extending on a north east to south west axis from the Broadland Growth Triangle through the Norwich urban area to Hethersett and Wymondham.

4.10. The GNLP should recognise this "strategic growth area" which can be broadly defined to include:

- The City of Norwich;
- The suburbs/fringe parishes which make up the rest of the urban area;
- All the strategic employment areas, Norwich City Centre, Norwich Research Park, Longwater/the Food Hub, Wymondham, Hethel, the Norwich Airport area, Broadland Business Park, Broadland Gate and Rackheath. These areas provide for growth of the key employment sectors identified in the Norfolk and Suffolk Economic Plan. Local evidence shows that all of the strategic employment locations have the potential for jobs and business growth;
- Around 80% of total housing growth (existing commitment and emerging distribution);
- All but one of the strategic scale housing growth locations (locations with 1,000 dwellings +);
- High quality public transport, road and cycling infrastructure (existing and planned);
- The great majority of brownfield sites in the area.

4.11. In addition to its role in the local plan, identifying this area promotes the strategic economic strengths and sectors of Greater Norwich, helping to maximise growth potential. It demonstrates that further growth in strategic employment areas is supported by good infrastructure and nearby housing.

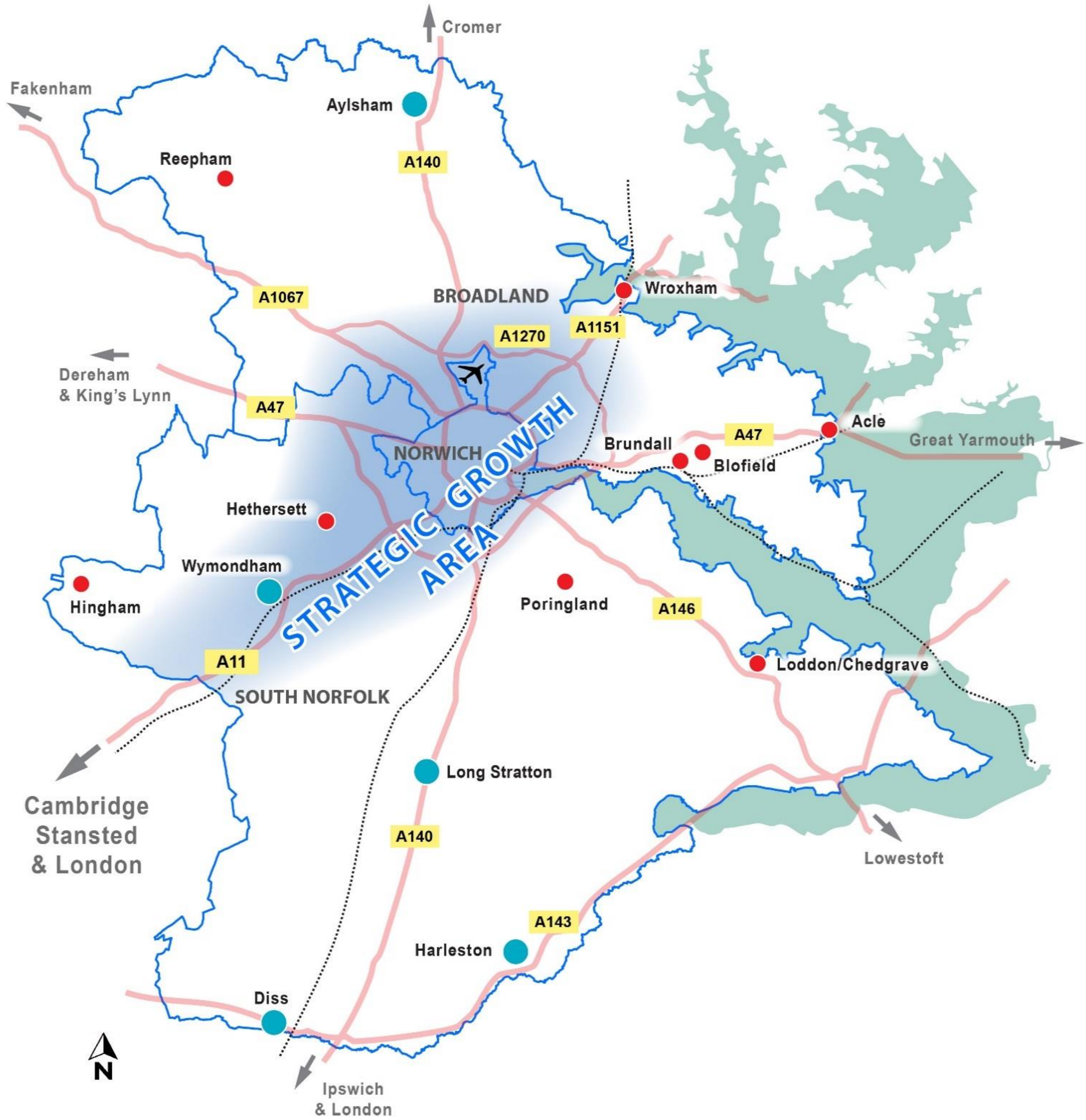
4.12. By linking to other growth corridors, it will place Greater Norwich firmly on the national stage for growth and assist in accessing funding opportunities.

4.13. Recent success with the Transforming Cities Fund has shown that broadly defining a strategic growth area covering all of the key economic assets enables specific, area-based data to be presented to Government and other funding bodies. This emphasises the existing strengths of the Greater Norwich economy, its potential for growth, and ability to make best use of rapidly changing technologies.

4.14. With Norwich playing an anchoring role in the strategic growth area, it recognises the role the city plays as a driver of the regional economy, supporting the vitality and regeneration of the city centre, including maximising the potential of brownfield sites, and promoting further development of sustainable urban extensions.

4.15. The maps below illustrate the areas within which committed and proposed housing growth, including strategic scale growth, would be concentrated and the distribution of the Main Towns and Key Service Centres. **The maps are not a draft Key Diagram** for the plan. The Key Diagram will also include additional information such as important infrastructure and employment areas.

Greater Norwich Growth Strategy



Key

- Strategic Growth Area
- Main Towns
- Key Service Centres
- Broads Authority Area (outside the GNLP area)
- A Roads
- Railways
- Norwich International Airport

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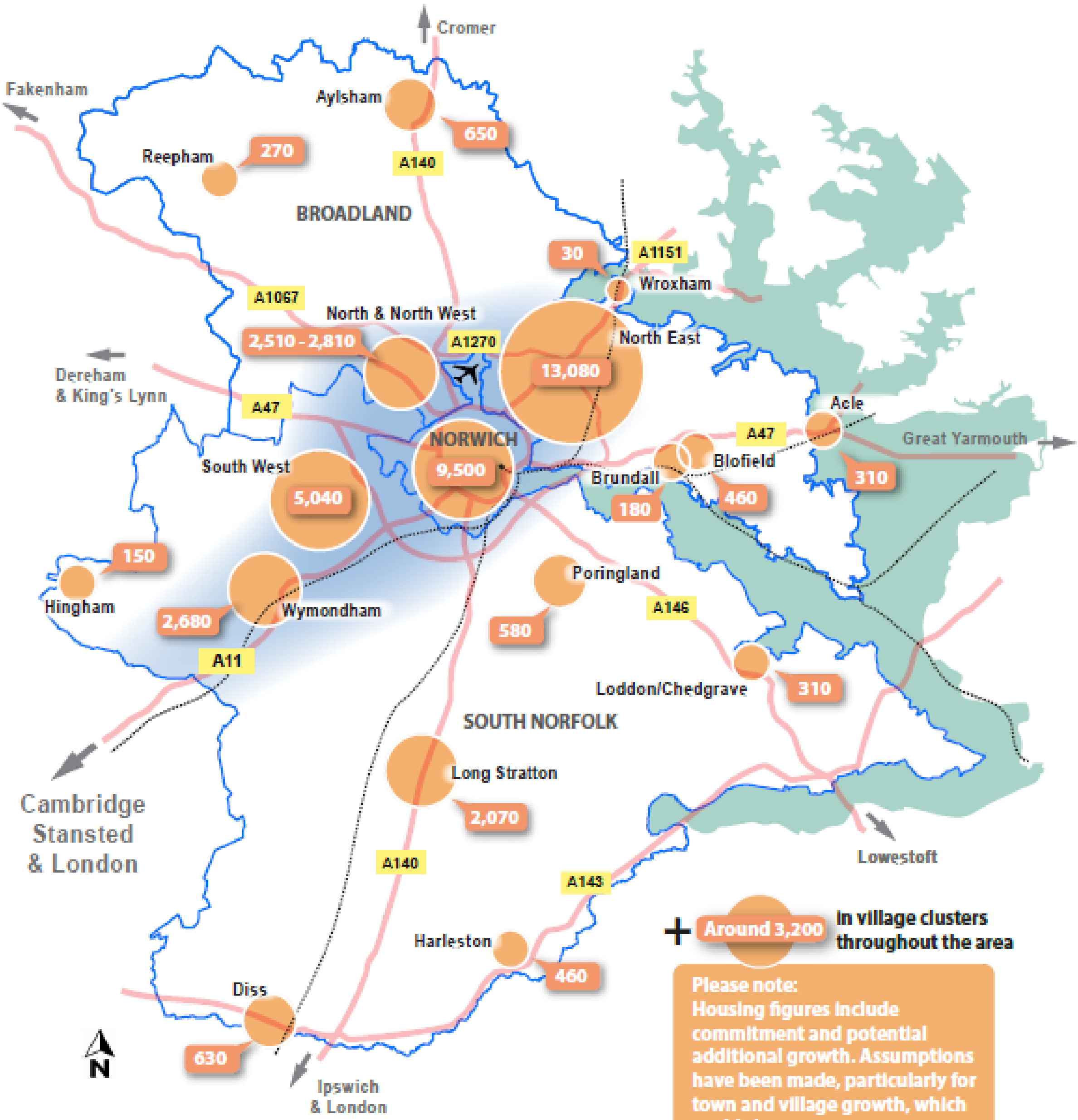
Greater Norwich Housing Growth Locations

(Indicative, showing the potential impact of the proposed approach)



Key

- Strategic Growth Area
- Indicative overall housing growth to 2036, including existing commitment (housing allocations and permissions)
- Broads Authority Area (outside the GNLP area)
- A Roads
- Railways
- Norwich International Airport

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Other Main Towns and Long Stratton

4.16. The **Main Towns** of Aylsham, Diss and Harleston, along with the growing settlement of Long Stratton, will collectively provide for 9% of the proposed housing growth planned to 2036. The market towns play a vital role in the rural economy, providing employment opportunities and services for wider hinterlands. As such, they are engines of rural growth and it is important that they are enabled to grow at appropriate scales, given existing infrastructure and environmental constraints, to enable them to thrive.

4.17. Long Stratton is already planned to grow significantly over the coming years, and it is anticipated that this growth, along with the provision of a much needed by-pass, will assist in the development of further employment and services within the village.

Key Service Centres

4.18. **Key Service Centres** will provide 5% of the proposed housing growth. This figure largely reflects the recent rapid increase in commitments and the relatively good range of services in these locations. High levels of commitment in Blofield/Brundall and Poringland/Framingham Earl and environmental and traffic constraints in Wroxham suggest limiting further growth, with the additional growth largely shared between Acle, Hingham, Loddon and Reepham.

Village Clusters

4.19. Board members have been clear that they favour an approach that places all remaining areas of Greater Norwich within a **Village Cluster** based on primary school catchments. To reduce additional car journeys and encourage healthy and active lifestyles, and reduce the risks to soundness, it is advisable to limit new housing allocations to sites within the cluster with good access to a primary school and a "safe route to school". The scale of growth in any cluster will reflect school capacity or ability to grow, plus the availability of other accessible services. Taking account of the timescales for delivery and other uncertainties, such as pupil preference, it is reasonable to assume that a minimum scale of allocation (15 to 20 dwellings) can be accommodated in all clusters if appropriate sites are available. The identification of sites with the fewest constraints will also help to determine the amount of growth in specific clusters. Under the proposed strategy, the clusters will provide around 7% of growth.

4.20. Other policies will allow for windfall development across the plan area including infill and/or small extensions in other villages.

5. Conclusion

5.1. The emerging strategy as proposed in this report provides a positive approach to guide further development of the GNLP.