
GREATER NORWICH LOCAL PLAN

REGULATION 18 CONSULTATION

GROWTH OPTIONS

Representations Submitted on Behalf of
Landstock Estates Limited and Landowners Group Limited

March 2018

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GROWTH OPTIONS
REPRESENTATIONS SUBMITTED ON BEHALF OF
LANDSTOCK ESTATES LIMITED AND LANDOWNERS GROUP LTD
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1.0 INTRODUCTION

1.1 These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group Ltd (the Promoters) in response to the Greater Norwich Growth Board (GNGB) consultation on the Greater Norwich Local Plan (GNLP) Regulation 18 Consultation. The consultation comprises the following documents, with no single overarching 'plan' for review:

- Site Proposals consultation document (SPCD);
- Growth Options consultation document (GOCD);
- Interim Sustainability Appraisal; and
- The Evidence Base, including the Strategic Housing Market Assessment (SHMA), Housing and Economic Land Availability Assessment (HELAA) and New Settlements Topic Paper.

1.2 The Promoters have land interests in North East Wymondham (circa 160ha) (**Appendix 1**) which forms part of a larger site previously promoted (HELAA Ref. GNLP0525) through the adopted Joint Core Strategy (2013), South Norfolk Site Specific Allocations and Policies Document (2015), South Norfolk Development Management Policies Document (2015) and the Wymondham Area Action Plan (2015).

1.3 In recent years, a number of applications/appeals have been granted/allowed within the previously promoted site area amounting to circa 1,430 dwellings (and as shown in Appendix 1). These parcels no longer form part of the site now being promoted, albeit they have been brought forward in a coordinated fashion to facilitate potential future allocation of land including access rights, vehicle linkages and green spaces.

1.4 Notwithstanding specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy and guidance framework set out within the National Planning Policy Framework (NPPF) (March 2012) and National Planning Policy Guidance (PPG) (March 2014). In addition, the emerging amendments to the NPPF (presently out for consultation) have been taken into account.

i) National Planning Policy Framework

1.5 The NPPF, published in March 2012, put the 'presumption in favour of sustainable development' at the forefront of planning, to be seen as the 'golden thread' running through both plan making and decision taking (para 14).

- 1.6 Para 15 confirms that 'policies in Local Plan should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.
- 1.7 As detailed in Para 47, in seeking to ensure a 'presumption in favour of sustainable development' is achieved, local planning authorities should, among other things, 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period'.
- 1.8 Paragraphs 150 – 185 regard Plan Making. Para 151 confirms that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development.
- 1.9 Para 178 refers to the 'duty to cooperate', requiring authorities to seek agreement on cross administrative boundary planning issues, particularly those relating to the strategic policies in Para 156, including the homes and jobs needed in an area. Further, para 178 notes an expectation on authorities to demonstrate joint working on areas of common interest, for the mutual benefit of neighbouring authorities.
- 1.10 As detailed in Para 182, Local Plans will only be considered 'sound' where they are:
- **Positively prepared** – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
 - **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy.**
- ii) Proposed Amendments to the National Planning Policy Framework**
- 1.11 An amended version of the National Planning Policy Framework is currently being consulted, with the draft text for consultation being published on 05 March 2018. The draft incorporates proposed amendments arising from the Housing White Paper (February 2017) to 'fix the housing market', as well as incorporating the proposed Standardised Housing Needs methodology, as detailed in the Planning for the Right Homes in the Right Places consultation (September 2017).

- 1.12 The revised text, as currently published, re-iterates the requirement for sustainable development to be pursued in a positive way, with the heart of the framework being the presumption in favour of sustainable development (para 10).
- 1.13 In respect of plan-making, the tests of soundness remain, albeit amended and plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (para 11).
- 1.14 Plan-making has been brought forward to the front of the Framework, now forming Section 3. As confirmed in para 15, the planning system should be genuinely plan-led, with succinct and up-to-date plans providing a positive vision for the future of an area, addressing housing needs and other economic, social and environmental priorities.
- 1.15 Paragraphs 20 – 25 regard the strategic policies/priorities of the plan, confirming that authorities should include relevant strategic policies for, and any necessary strategic site allocations to deliver:
- An overall strategy for the pattern and scale of development;
 - The homes and workplaces needed, including affordable housing;
 - Appropriate retail, leisure and other commercial activity;
 - Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - Community facilities (such as health, education and cultural infrastructure); and
 - Climate change mitigation and adaption, and conservation and enhancement of the natural built and historic environment, including landscape and green infrastructure.
- 1.16 Strategic policies should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues) to provide a clear starting point for any local policies that may be needed (para 21). Furthermore, strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities (para 22).
- 1.17 Paragraph 36 confirms plans are to continue to be examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound (on the basis of them being positively prepared, justified, effective and consistent with national policy). These tests of soundness will be applied to local policies in a proportionate way taking into account the extent to which they are consistent with relevant strategic policies for the area (para 37).

iii) Summary of Representations

1.18 These representations respond to the content of the GNLP Regulation 18 consultation, with reference where applicable to relevant policy, consultation documents and the evidence base. We reserve the right to comment on wider matters in future consultations.

1.19 The Regulation 18 consultation sets out 6No. potential 'Growth Options' for the GNLP. It is recognised at this stage that the options represent a range of suitable alternatives to be considered by the GNGB, but the Regulation 18 consultation is lacking in an appropriate and proportionate evidence base (such as Education matters) to form a view as to the most appropriate strategy. Further iterations of the plan need to rectify this otherwise the plan would not be **Justified** or **Positively Prepared**.

1.20 In summary, our representations demonstrate:

- The GNLP is required to allocate land for 7,200 new dwellings, incorporating the proposed Standardised Methodology as the OAN starting point, plus a 10% buffer. This is **positively prepared**;
- The proposed expansion of the existing Norwich Urban Area to include lower tier settlements outside the continuous urban area is **inconsistent with national policy**;
- The SHMA demonstrates that a 'Core Area' exists that represents the strongest functional connection to the Norwich Urban Area. Evidence, reviewing the functional economic relationships within the Greater Norwich Area, has been prepared and supports the continued recognition of an area, akin to the existing Norwich Policy Area, to focus growth. A policy should be prepared to that effect;
- The proposed removal of a Core Policy Area (i.e. NPA) results in all the growth options failing to suitably consider the influence of the 'Core Area' and therefore the area with the strongest functional relationship to Norwich. **It is not effective**;
- It is recognised that some options focus growth as an Urban Concentration, but this would not address the wider plan objectives. It is proposed that *a combination of the growth options 2 and 3 is considered*;
- These representations present evidence which demonstrates the strength of the A11 corridor and that Wymondham, as a Main Town can play a critical role and support more growth than presently identified. This includes the delivery of specific infrastructure to address the South West sector;
- Focusing growth within the Cambridge Norwich Tech Corridor is vital to meet the plan's Visions and Objectives and promote economic growth to meet the City Deal aspirations;

- It is vital the GNLPA acknowledges the severity of the education capacity issue in Wymondham and the south-west sector and identifies this as a strategic priority for resolution; and
- The promoted site, at Land at North East Wymondham, is deliverable, providing a sustainable location for growth which can, crucially, provide a solution to the education capacity issue, subject to sufficient growth being allocated.

1.21 A summary of our response to questions contained within the GOCD, as well as other responses to specific GOCD proposals, is shown below in table 1.1.

Table 1.1 – GOCD response summary

	Support/Object/Comment	Soundness Reason	Summary
Question 2	Support	-	We support the broad objectives and policy headings listed. Certain Growth Options will need to be pursued (i.e. Options 2 and/or 3) to ensure these objectives are met. Places such as Wymondham are critical in this respect.
Question 3	Comment	-	We support Option JT1.
Question 4	Support	-	The GOCD correctly identifies the Government's proposed standardised methodology as the starting point.
Question 5	Support	-	A 10% buffer will support delivery to achieve social and economic growth, provided the distribution of allocation is appropriate.
Question 6	Support	-	Provision of windfall development 'in addition' to housing requirement is consistent with the context of the NPPF and reflects the GNLPA 'pro-growth' agenda.
Question 7	Comment	-	The proposed scale of development will require provision of new infrastructure, including those which have not been addressed

	Support/Object/ Comment	Soundness Reason	Summary
			through previous plan making exercises (i.e. Secondary Education capacity in the South West sector).
Question 8	Comment	-	There is clear evidence that delivery rates in the Joint Core Strategy Area have never been met. The collective failure of the Joint Core Strategy's planned allocations represent a real risk that existing commitments will not be fully delivered by 2036. In this respect, it will be critical that the GNGB selects deliverable sites in suitable locations, Wymondham is such a location.
Question 9	Comment	Option 1, 4 – 6 result in a plan which is ineffective / unjustified / not positively prepared	Option 2 has a number of merits and is a favoured option, however the overall distribution risks delivering unsustainable development towards Diss and allocations in locations that have a history of not delivering. Option 3 is a favoured option, however the proposed distribution is presently inappropriate.
Question 11	Comment	-	A hybrid version of Options 2 and 3 should come forward as a preferred option, serving to ensure a 'Core Area' is supporting while focusing development along the A11 corridor. Evidence has been prepared to demonstrate the continued importance of the NPA/Core Area for directing growth and confirms the most appropriate strategy for growth will include

	Support/Object/ Comment	Soundness Reason	Summary
			necessary measures to realise the full economic and social benefits of the Cambridge Norwich Tech Corridor. Table 4.2 proposes an appropriate dispersal to achieve this and elevates the role of Wymondham. The allocation of sufficient growth in Wymondham will also resolve the strategically important Secondary Education capacity issue.
Question 12	Object	The delivery of a new settlement is not justified or considered effective	The delivery of a new settlement could be a suitable long-term aspiration of the plan, however its delivery is risky and unpredictable and therefore should not be relied upon in the current plan period. Further, sufficient suitable and deliverable land, adjoining existing sustainable settlements, has been identified, and therefore it is not considered necessary for a new settlement to be relied upon at this time.
Question 26	Support	The removal of a policy directing growth to a suitable area risks the Plan being found not effective	Without a policy area focusing growth in key locations there are risks the strategy will fail. We strongly urge the GNLP to continue the approach set by the NPA in directing growth to a defined area with the strongest functional relationship to Norwich (with NPA or similar distinction). Evidence provided as part of these representations demonstrates the NPA remains a relevant area to

	Support/Object/ Comment	Soundness Reason	Summary
			direct growth, given its continued high degree of self-containment.
Growth Options - Baseline	General Comment / Objection	The current approach is unjustified	No evidence is presented which supports the baseline proposed. The current distribution suggests a predetermined strategy which is inappropriate and disproportionate.
Growth Options – Settlement Hierarchy	General Comment / Objection	The current approach is unjustified and inconsistent with national policy	The proposed extension of the Fringe Area to include Hethersett (among others) inappropriately elevates less-sustainable locations in the Settlement Hierarchy.

2.0 HOUSING NUMBERS

Q4) Do you agree that the OAN for 2017 – 2036 is around 39,000 homes.

2.1 Yes. The Government's proposed standardised methodology for Greater Norwich requires the delivery of 2,052 dwellings per annum, or a requirement of 38,988 dwellings across the plan period (2017 to 2036). The Growth Options consultation document (GOCD) correctly identifies this as the starting point for calculating the housing requirement for the plan (para 4.18).

Q5) Do you agree that the plan should provide for a 10% delivery buffer and allocate additional sites for around 7,200 homes?

2.2 Yes. Para 4.20 – 4.21 of the GOCD confirms the GNLP will seek to over-allocate by means of a 10% buffer to maximise the potential delivery and ensuring housing is delivered to tackle the housing shortage and support economic growth. The 10% buffer, equating to a total of 3,899 dwellings would include the additional 1,700 dwellings identified to meet the City Deal and results in a remaining additional 2,199 dwellings to be allocated. This takes the total housing requirement to 42,887 and the need to identify 7,200 new allocations.

2.3 Section 4 of the GOCD confirms one of the key aims of the GNLP will be to drive economic growth across the plan period by delivering an increase on forecast growth in jobs and productivity. This is a reflection of the aims and aspirations of the Greater Norwich City Deal which covers the GNLP area and is being delivered by the Greater Norwich Growth Board (GNGB).

2.4 The City Deal, which was signed into effect by the Government in December 2013, gives Greater Norwich increased freedom to help business grow and create economic growth. As detailed in the City Deal report (December 2013), the deal aims to bring an additional 13,000 jobs and 3,000 homes (above Joint Core Strategy requirements) to the Greater Norwich Area. As detailed in the Central Norfolk Strategic Housing Market Assessment (June 2017) this equates to a total of 45,390 jobs over the plan period. **In this respect, we support Option JT1** as identified in **Question 3**.

2.5 This approach will help support delivery to achieve social and economic growth, provided that the distribution of these new allocations is appropriate.

Q6) Do you agree that windfall development should be in addition to the 7,200 homes?

- 2.6 Yes. To ensure the GNLP provides sufficient flexibility to enable growth to come forward, the GOCD proposes windfall development be 'in addition' to the housing requirement. This is consistent with the context of the NPPF (including the emerging NPPF).
- 2.7 Given the lack of delivery in the Joint Core Strategy area, there is a particular need to ensure a strong emphasis on boosting housing supply. In this respect, the current Joint Core Strategy provides an 'at least' housing target. In the light of the intention to rely on so many additional windfall dwellings (5,600 dwellings) to introduce the flexibility, the plan should reflect that the 42,887 target is an at least figure with the housing requirement figure not being a ceiling. This would support the GNGB 'pro-growth' agenda.
- 2.8 While anticipated windfall development will go some way to delivering additional housing, the scale of the windfall figure could have an impact on local infrastructure and services. It is therefore recommended that the GNGB undertake an appropriate evidence base (i.e. SEA/SA) on a total housing figure of **48,487 dwellings**.

Q7) Are there any infrastructure requirements needed to support the overall scale of growth.

- 2.9 Yes. The scale of development will clearly require the provision of new infrastructure to appropriately and sustainably meet the demands of this growth. There are key pieces of infrastructure that are necessary to be addressed that have otherwise not been delivered or proposed to be delivered as part of the Joint Core Strategy 2013. A good example, and as detailed further below, is the need to positively address the Secondary Education capacity in the South West sector and specifically in Wymondham. This is an issue that has been highlighted by the Inspector examining the Wymondham Area Action Plan as being "necessary to review" as part of future plan-making exercises.

Q8) Is there any evidence that the existing housing commitment will not be delivered by 2036.

- 2.10 Yes. At the mid-point of the Joint Core Strategy plan period (01 April 2017), there is clear evidence that the delivery rates in the Joint Core Strategy Area have never been met (see Annual Monitoring Report 2016 – 17, March 2018, Appendix A). There is at present a deficit of 4,957 dwellings (of a midpoint cumulative requirement of 18,414) from the start of the

plan period (2008/09) to the most recent monitoring year (2016/17) (collective failure) across the plan area as a whole. The deficit within the NPA is even higher at 6,493 dwellings during the same period.

- 2.11 Whilst it is recognised that there are external factors that can affect delivery, the collective failure of the Joint Core Strategy's planned allocations in not meeting the target represents a real risk that the existing commitments will not be fully delivered by 2036.
- 2.12 Within the NPA, the forward 5-year annual completion rate to meet the Joint Core Strategy minimum target level, including the required 20% buffer, is now in the range of 3,056 to 3,748 dpa (double the planned rate), with the Annual Monitoring Report 2016-17 conceding the requirement in the 5-year period 2017 – 2022 will fall short by up to 4,650 dwellings.
- 2.13 In this respect, it will be critical that the GNGB selects deliverable sites in suitable locations. As detailed in Section 1, the Promoters have successfully secured consents resulting in some 800 dwellings being completed in Wymondham over the past 12 years from previously unidentified sites. This reflects not only the suitability of Wymondham as an appropriate location (i.e. people want to live there) but also represents a proven and trusted track record for the Promoters in bringing forward suitable sites where people want to live. This is a material consideration in determining the suitability of sites coming forward. Additionally, it should be noted that the land being promoted lies adjacent to the existing urban area including new development. As such, utilities and services are being actively delivered and this brings with it advantages compared to the creation of say, a new garden Village which will require substantial upgrades to existing infrastructure and significant new infrastructure.
- 2.14 The new annual target for 2017 – 2036 (assuming 42,887 dwellings) across the entire plan area will represent an annual requirement of 2,257dpa. This equates to 11,286 dwellings in any given 5-year period and **assumes** that the current deficit (in excess of 6,400 dwellings) is 'wiped clean'. This could potentially give the impression that 'all is well' and the failure to meet past targets is simply forgotten.

3.0 SPATIAL OPTIONS

Q2) Do you support the broad strategic approach to delivering jobs, homes and infrastructure

3.1 Yes. Para 4.1 of the GOCD confirms delivery is key to the success of the plan. To realise this, and to successfully achieve the Visions and Objectives of the plan, the document identifies 6no. policy headings which will be included in the GNLP. These are:

- Support the economy through infrastructure investment, environmental enhancement and quality of life improvements;
- Enable development of the strategic employment locations in the city centre, the Norwich Airport area, Broadland Business Park/Broadland Gate, NRP, Wymondham/Hethel, Longwater and the Food Enterprise Zone;
- Promote the Cambridge Norwich Tech Corridor growth initiative;
- Promote inclusive growth and social sustainability;
- Provide for local employment close to where people live;
- Support a thriving rural economy.

3.2 We support the broad objectives and the policy headings detailed above. We note that if these objectives are to be met, there is a need to ensure that certain Growth Options are pursued i.e. Growth options 2 and/or 3. These options focus growth in the above stated location specific areas (i.e. locations along the A11 corridor and others) as well as being able to achieve the other stated non location specific objectives. Places such as Wymondham are critical in this respect.

4.0 THE GROWTH OPTIONS

i) The Base Line

- 4.1 The GOCD presents 6no. 'alternatives' each identifying a different approach to the distribution of growth.
- 4.2 The 6 options are all predicated on a base line position that 3,900 dwellings have already been distributed to certain locations. Of this, 1,700 dwellings have been cited to be delivered in Norwich City. It is assumed that this reflects the additional dwellings necessary to deliver the City Deal, and therefore is broadly acceptable.
- 4.3 However, the remaining 2,200 dwellings have been spread across various settlements. This suggests that a predetermination of the strategy (in part) has already taken place. This is not appropriate as up to 1,000 dwellings have been located in service villages and only 550 dwellings in Main Towns. Whilst there are more service villages (and therefore a greater number of dwellings have been spread across those locations), it should be recognised that the net effect is that up to 1,000 dwellings (14% of the total new allocations) are already assigned to service villages before the main strategy has been set. This is disproportionate and would in fact double the existing commitments of the service villages.
- 4.4 There is no evidence presented that supports the above baseline of spreading the 2,200 dwellings and we recommend that the base line should only apply to 1,700 dwellings in Norwich City.

ii) The Ranking of Locations Outside of the Settlement Hierarchy

- 4.5 The 6No. options are all accompanied by supporting tables which seek to place locations in sustainability order from Norwich City, to Fringe Sectors to Main Towns and so on. Whilst it is necessary to prepare such a hierarchy, it is noted that the designation of 'Fringe Sectors' includes some locations which are, in their own right, not as sustainable as locations which are further from Norwich City but larger in scale. A good comparison is the relationship of Hethersett (a Key Service Centre and identified in the Fringe Sector) and Wymondham, some 1.5km (from New Road to Elm Farm Business Park, i.e. the development boundary edges) to the southwest (a Main town and not in the Fringe Sector).

- 4.6 The result is that a location that is recognised as being only a Service Centre, is deemed more appropriate for large scale growth simply because the perception that the location is closer to Norwich and therefore by default a more appropriate location to deliver greater growth.
- 4.7 There is no justification for the scale of growth identified in locations such as Hethersett as a fringe location when it is in practice, truly a Key Service Centre and are located beyond the continuous development of Norwich.
- 4.8 As a consequence, the increased status of these locations, in the broad 'Urban Area' definition, risks them receiving a disproportionate level of growth which is not an accurate representation of each settlement's sustainability. This has come through in some of the Options put forward.
- 4.9 Whilst we accept the existing Norwich Urban Area is likely to be suitable for an element of additional growth above existing commitments, the proposed extension of the Fringe Area to include Hethersett is **unjustified** and should be reviewed. The plan risks being found **inconsistent with national policy** if this approach is pursued, with less-sustainable locations elevated in the Settlement Hierarchy. This is not in accordance with Section 39(2) of the Planning and Compulsory Purchase Act 2004 which confirms the plan-making process must exercise the objective of contributing to the achievement of sustainable development.
- 4.10 Whilst the hierarchy is a starting point, it does not determine the scale of development appropriate in a particular settlement. As confirmed in para 4.42 of the GOCD, the scale of development appropriate to a particular settlement will depend on a number of factors including local service, deliverability, location in relation to strategic services and job opportunities, as well as local constraints and opportunities.
- 4.11 The most appropriate strategy for growth will therefore be influenced by a number of key factors, most importantly the opportunities identified to achieve the Visions and Objectives of the plan and the measures enabled to deliver economic, social and environment sustainable development.

Q9) Which alternative or alternatives do you favour

- 4.12 **Our favoured Options lean towards Option 2 and/or 3.** This is in part a reflection of the aims and visions identified in the Spatial Options, the evidence presented in these representations and the role Wymondham can play both in its location to the A11 and Norwich, as well as the suitability and deliverability of the site itself.

- 4.13 Para 4.65 of the GOCD acknowledges the chosen strategy may be an amalgamation of the options, with no 'preferred' options identified at this time. We support this recognition (see response to Question 11), but set out our position on each alternative scenario below.
- 4.14 The Interim Sustainability Appraisal assesses each alternative against 15no. sustainability objectives, on the basis of its likely effects. The alternatives have been tested and show that Options 1 -3 score more preferably than options 4 – 6. Of interest to note, the SA shows that Options 4 and 5 score particularly negatively on sustainable transport modes. Options 1 -3 score the same.
- 4.15 The potential distributions, specifically in regards to Main Towns, is as set out below in Table 4.1.

Table 4.1 – Main Town Distribution (dwellings)

	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6
Baseline	550	550	550	550	550	550
Main Towns	0	1,100	700	650	650	150
Total	550	1,650	1,250	1,200	1,200	700
		Predominately to Wymondham in the A11 corridor and to Diss	Predominately to Wymondham in the A11 corridor	Large majority to Wymondham, Diss and possibly Harleston	Large majority to Wymondham, Diss and possibly Harleston	To Wymondham, Diss and possibly Harleston

iii) Option 1 – Concentration Close to Norwich

- 4.16 Option 1 seeks to deliver all growth within the confines of the existing urban area fringe sectors, with 1,000 homes being delivered in the north-east, 600 in the north and north-west, 500 in the west and 1,200 in the south-west. There would be no growth, beyond baseline, in other settlements outside this area (including the Main Towns).
- 4.17 The SA suggests this option results in development likely being in close proximity to existing employment opportunities and within easy access to public transport. It therefore scores highly in the Interim Sustainability Appraisal (SA11 and SA12). Option 1 is also identified to provide the best option in regards to reducing carbon emissions, adapting to and mitigating against the effects of climate change.

- 4.18 As confirmed in the Interim Sustainability Appraisal, Option 1 would result in a reliance in a number of large allocations, therefore exposing the plan to long lead-in times. Furthermore, growth would be focused in locations already experiencing significant growth and therefore provide less diversity in the market.
- 4.19 This risk is further exacerbated by the historic under delivery of sites within the north-east of the Urban Fringe (including the Growth Triangle) which leads to doubt as to whether this option would be able to achieve the level of growth intended.
- 4.20 Further, while the option includes an element of growth along the Cambridge Norwich Corridor (within the south-west fringe) this option will fail to deliver the necessary homes along this corridor, in locations close to potential employment opportunities, to fully deliver the economic potential of this key location and undermine the Spatial objectives of the plan.
- 4.21 On this basis, Option 1 is considered to be an inappropriate strategy for growth which would not result in an effective or positively prepared plan. **Option 1 is not supported.**

iv) Option 2 – Transport Corridors

- 4.22 Option 2 aims to direct growth along existing transport corridors, specifically the A11, A47 (W), A140 and A1151. The options identifies the following distribution above baseline:
- Fringe Sectors - 2,200 dwellings inc. 1,000 in north-east, 200 in north and north-west, 500 in west and 500 in south-west; and
 - Main Towns - 1,100 dwellings, predominantly in Wymondham in the A11 Corridor and Diss, and possibly including villages on A140 (S), other than Long Stratton.
- 4.23 Option 2 would result in a more 'distributed' form of development, with allocations (above baseline) attributed to key locations along the 'transport corridors'. Thereby ensuring that development would be located within highly accessible locations on existing transport routes. Importantly, the specific identification of the main towns ensures that the development is directed to the most sustainable locations along these corridors.
- 4.24 Option 2 will support the Cambridge Norwich Corridor, with allocation in the south-west Fringe and in Wymondham. We question if Diss, located circa. 20 miles from Norwich, can truly play a role delivering sustainable development when assessed against the spatial objectives of the A11 corridor and the Core Area.

4.25 Furthermore, Option 2 seeks to allocate up to 1,000 dwellings to the north-east of the Urban Fringe. This area already has a substantial number of committed sites or allocations which are not delivering at the rate anticipated. Locating so many dwellings in this area would represent a significant risk of delivering the number of dwellings in the plan period.

4.26 Option 2 has a number of merits and is a **favoured option**, particularly the main role Wymondham can play in this option, but the overall distribution risks deliver unsustainable development towards Diss and the identification of allocations in locations that have a history of not delivering.

v) Option 3 – Support the Cambridge Norwich Tech Corridor

4.27 In addition to baseline growth, Option 3 directs allocations to the A11 corridor, supporting the Cambridge Norwich Tech Corridor. The following distribution above baseline is identified:

- Fringe Sectors – 2,000 dwellings inc. 500 in the east (between NRP and Food Enterprise Zone) and 1,500 in the south-west;
- Main Towns – 700 dwellings predominately in Wymondham;
- Key Service Centres – 100 dwellings to Hingham; and
- New Settlement – 500 dwellings, in or near the A11 corridor.

4.28 The Interim Sustainability Appraisal (SA11 Encouraging Economic Development) identifies that this alternative has been specifically derived to support economic growth plans and therefore has further potential benefits (above others) that would result in a housing distribution to support a specific economic growth initiative.

4.29 Despite the focus on the A11 corridor and that Wymondham is the only Main Town on the A11 Corridor, it oddly receives a reduced allocation that Option 2 above. This is in part because the south-west Fringe Area Locations have in our view, been afforded an over-reliance on growth (1,500 dwellings) that is not truly reflective of their sustainability credentials or place in the settlement hierarchy (see response to Q26). Furthermore, Option 3 includes provision of a new settlement, located along the Corridor, which is not considered to be appropriate to be relied upon at this time.

4.30 In its current form, Option 3 is considered to be ineffective as the role of Wymondham has been diluted in favour of less sustainable locations (i.e. Hethersett) or more challenging sites to be delivered (i.e. new settlement).

4.31 **Option 3 is a favoured option** as it is considered appropriate to focus on the A11 corridor. However, the exact split of dwellings across the south-west sector is presently inappropriate and can be remediated through a revised distribution (from south-west fringe and new settlement) to providing additional growth in Wymondham – more akin to the levels in Option 2.

vi) Option 4 – Dispersal

4.32 Option 4 provides high level dispersal to villages with only limited growth allocated to the fringe and A11 Corridor, with the following above baseline:

- Fringe Sectors – 350 dwellings inc. 100 in north and north-west, 100 in west and 150 in south-west;
- Main Towns – 650 dwellings mainly to Wymondham, Diss and possibly Harleston;
- Key Service Centres – 400 dwellings majority to those in South Norfolk; and
- Other – 1,900 dwellings to villages dependent on a range of factors including availability of sites, location, access to services and deliverability.

4.33 The option scores poorly, in the Interim Sustainability Appraisal, in regards to potential impacts on air, noise and light pollution (SA1), the protection and enhancement of biodiversity and geodiversity assets (SA3) and reducing the need to travel and promote the use of sustainable transport modes (SA12), with a 'likely significant negative effect' in all these regards. The option performs less well (likely positive effect) than Options 1 – 3 (likely significant positive effect) in regards to the encouragement of economic development (SA11).

4.34 Option 4 seeks to distribute a significant level of growth to areas outside of the 'Core Area' and settlements lower down the settlement hierarchy, and therefore by nature less sustainable. As acknowledged in the Interim Sustainability Appraisal, this option would result in the 'least preferential' relationship to the focus of jobs, facilities, services and sustainable transport options near to Norwich.

4.35 Furthermore, the distribution of Option 4 is largely unknown, with a significant proportion to be 'dependent on a range of factors'. As such it is currently not possible to consider, in detail, the potential sustainability impacts (or benefits). This is a significant risk which cannot be properly assessed this time.

4.36 Option 4 is not considered to be the most appropriate strategy for growth and would result in a plan which is unjustified and inconsistent with national policy. **It is not favoured.**

vii) Option 5 – Dispersal plus New Settlement

4.37 Broadly similar to Option 4, albeit with the provision of a new settlement, the following distribution is proposed above baseline:

- Fringe Sectors – 350 dwellings inc. 100 in north and north-west, 100 in west and 150 in south-west;
- Main Towns – 650 dwellings mainly to Wymondham, Diss and possibly Harleston;
- Key Service Centres – 400 dwellings majority to those in South Norfolk;
- Other – 1,400 dwellings to villages dependent on a range of factors including availability of sites, location, access to services and deliverability; and
- New Settlement – 500 dwellings, within a transport corridor.

4.38 The findings of the Interim Sustainability Appraisal are as per Option 4, with Option 5 likely to result in significant dispersal of development to locations less well related to services, facilities and employment opportunities.

4.39 Furthermore, Option 5 includes the provision of a new settlement, located within a transport corridor. While this may result in a benefit above that proposed in Option 4 (if the new settlement is located within the 'Core Area' and/or Cambridge Norwich Corridor), as detailed below, it is not considered appropriate for this to be relied upon at this time.

4.40 Option 5 is not considered to be the most appropriate strategy for growth, resulting in a strategy which would be unjustified and inconsistent with national policy. **Option 5 is not favoured.**

viii) Option 6 – Dispersal plus Urban Growth

4.41 Option 6 provides general dispersal across villages, while allowing significant growth in the fringe parishes, particularly the north east and west fringe. The proposed distribution, above baseline, is as below:

- Fringe Sectors – 1,900 dwellings inc. 1,000 in north-east, 200 in north and north-west, 500 in west and 200 in south-west;
- Main Towns – 150 dwellings distributed to Wymondham, Diss and possibly Harleston;
- Key Service Centres – 150 dwellings majority to those in South Norfolk; and
- Other – 1,100 dwellings to villages dependent on a range of factors including availability of sites, location, access to services and deliverability.

- 4.42 Option 6 scores similarly in the Interim Sustainability Appraisal to Options 4 and 5, with the exception of SA12 (reducing the need to travel and promote the use of sustainable transport modes) where development in the Fringe Sectors would be better related to the Urban Area of Norwich. Despite this, a significant element of growth (1,100 dwellings) would be located within village areas, which would not be well placed to meet this sustainability criteria.
- 4.43 As noted above for Option 4 (and 5), the proposed distribution within villages is largely unknown, to be 'dependent on a range of factors'. As such it is currently not possible to consider, in detail, the potential sustainability impacts (or benefits). This is a significant risk which cannot be properly assessed at this time.
- 4.44 In regards to the remaining distribution, there is significant growth allocated to the north-east sector which, as detailed in Option 1, has experienced historic under delivery thereby leading to doubt as to whether this level of growth could be achieved within the plan period.
- 4.45 There is also limited growth attributed to other key locations, outside the Fringe Area, including others within the 'Core Area' and along the Cambridge Norwich Corridor which jeopardies the potential economic benefits these vital areas could deliver.
- 4.46 On this basis, Option 6 results in an unsuitable distribution of growth with a significant dependence on unknown village locations (which are, by nature, less sustainable than overlooked settlements), inappropriate reliance on northeast sites and a lack of support for the 'Core Area' and Cambridge Norwich Corridor. Therefore, Option 6 would result in an ineffective and unjustified plan which risks being inconsistent with national policy. **This option is not favoured.**

Q11) Are there any other strategic growth options that should be considered; and

- 4.47 Yes. We consider that a hybrid version of Options 2 and 3 should come forward as a preferred option. This would serve to ensure that a 'Core Area' is supported but that there is a focus for delivering development along the A11 corridor, fulfilling the Spatial Objectives of supporting the Cambridge to Norwich Tech Corridor plus locating growth near to jobs and infrastructure.
- 4.48 Wymondham has the capacity to accommodate a significant scale of growth. This is due to its Main Town status and that it is a location that has delivered housing. It has good employment areas in its own right but it located close proximity to Norwich.
- 4.49 We believe the role of Wymondham should be elevated and our proposed dispersal in Table 4.2 below seeks to achieve that.

Table 4.2 – ‘Hybrid Options’ Proposed Dispersal

	Commitment	Baseline	Option	Total	Growth %	Distribution of growth option
Norwich	6,999	1,500	-	8,499	20	The current figure of 1,500 homes in the baseline aims to maximise growth on brownfield sites whilst retaining sites for employment, town centre and open space uses. It will be kept under review as the plan progressed.
Fringe Sectors	21,381	200	1,700	23,281	54	Around: 500 homes in the north east; 200 in north and north west; 500 in the west; 500 in the south west. Due to existing commitment and environmental constraints associated with the Broads, there would be no growth in this option above the baseline in A47 (E) corridor.
Main Town	5,468	550	1,600	7,618	18	The remaining 1,600 homes would be allocated to Wymondham in the A11 Corridor.
KSCs	674	450	-	1,124	3	

	Commitment	Baseline	Option	Total	Growth %	Distribution of growth option
Service and Other Villages or Village Groups	1,143	1,200	-	2,343	5	
Totals	35,665	3,900	3,300	42,865	-	
		7,200				

4.50 Furthermore, through the allocation of sufficient growth to Wymondham the GNLP has the potential to resolve the ongoing Secondary Education capacity constraint currently affecting the south-west area (as detailed further in subsequent sections). While identified as an existing constraint by the Interim Sustainability Appraisal under objective SA10, the consultation fails to regard how the alternatives would influence this (either negatively or positively). Currently, any growth attributed to the south-west of the District has the potential to exacerbate this issue, with a risk that a no growth option could be considered if the situation is not suitably dealt with. This would have a fundamental impact on the potential of the GNLP to deliver its full economic and social benefits, with any growth directed away from the Cambridge Norwich Tech Corridor. It is therefore considered that a 'no growth' option within this south-west area is not an appropriate alternative. The education 'issue' therefore must be dealt with through this plan-making process.

4.51 Therefore, the preferred alternative is one which includes a recognition of the importance of the 'Core Area', directs significant growth to the Cambridge Norwich Corridor and allocates sufficient growth in Wymondham to resolve the strategically important issue of Secondary education capacity. This is a reasonable alternative which would help achieve the objectives of the GNLP. To ensure the plan is justified, this reasonable alternative therefore needs to be assessed as part of the Sustainability Appraisal to be undertaken.

4.52 A report, commissioned by Norwich City Council, entitled Norwich Economic Analysis (GVA, June 2017) examines the functional economic geography of Norwich and its growth potential. As acknowledged in para 2.8 of this report, the authority area of Norwich City Council is not an accurate geography in seeking to understand or capture the true economic value or potential created by Norwich. Instead the economic influence of Norwich extends beyond this urban area. Para 2.19 and Figure 6 (taken directly from the SHMA 2016) identify strong labour

connections with 11no. proximate settlements (including Wymondham), with Norwich functioning as part of a wide and interconnected network. As concluded in para 2.26 the 'Core Area' shows the settlements with the strongest connections to the Norwich Urban Area, suggesting a large proportion of housing should be delivered in these locations.

- 4.53 This is further reviewed in evidence prepared by Barton Willmore Development Economics (Greater Norwich Technical Report – Economic Geography, March 2018, Appendix 2) which provides an analysis of the functional economic relationships within the Greater Norwich Area, looking at the relationships between places where people live and places where people work.
- 4.54 A review of Travel to Work data highlights the strongest flows, outside the Urban Area and Fringe, are along the main arterial routes into the city, particularly along the A11 from the southeast. Relatively few people travel to Norwich from settlements near to the southern edge of the HMA, including Diss. The evidence highlights that the existing NPA, with 71% of Norwich workers residing within this area, broadly represents a Travel to Work Area.
- 4.55 Further to this, 81% of jobs in the Greater Norwich Area are located within the NPA, the majority of which are located within Norwich, its Fringe and Wymondham. The only settlement outside the NPA having in excess of 2,500 existing jobs being Diss.
- 4.56 Over the plan period, employment forecasts (provided by Oxford Economics) identify strong employment growth (circa. 17,000 across the Greater Norwich area), of which 83% of the forecast is predicted be located within the NPA (mainly Norwich and South Norfolk). These forecast, from Oxford Economics, are derived from nationally-consistent forecasts and therefore do not take full account of potential policy interventions designed to promote above-trend growth. In this instance, the GNLP acknowledges external influences which have the potential to deliver additional growth, including the Cambridge Norwich Tech Corridor and the City Deal.
- 4.57 This evidence highlights the importance of ensuring an appropriate spatial strategy is proposed which delivers the right number of homes in sustainable locations close to where jobs are expected to be created, including taking full account of initiatives such as the Tech Corridor and City Deal, which have the potential to deliver above-trend employment growth, boosting the local economy. The preferred option, a hybrid version of Option 2 and 3, will help achieve this.

Q26) Do you support a Norwich centred policy area and, if so, why and on what boundaries?

- 4.58 Yes. We support a Policy area focused towards Norwich City. This would ensure Growth is focused in the right areas to deliver the spatial strategy plan and allow for appropriate monitoring.
- 4.59 Historically, the Norwich Policy Area (NPA) has been the area used to ensure that growth needs arising from the Norwich urban area are delivered as acknowledged through para 4.159 – 4.170 of the GOCD.
- 4.60 The NPA is a long-standing policy designation, previously identified within the Norfolk Structure Plan and carried forward within the East of England Regional Spatial Strategy which encouraged Norwich-related growth to be located in close proximity to the City. As detailed in para 13.68 of the Regional Spatial Strategy (2008):

The Norwich policy area covers the urban area, the first ring of villages and the market town of Wymondham. In terms of numbers it is, with Cambridge, one of the two locations with the highest level of growth in the region. It will be the main focus for the north-east of the region, and has the potential to develop further as a major focus for long term economic development and growth.

- 4.61 The importance of the NPA was acknowledged in the adopted Joint Core Strategy (2011) which sought to direct strategic growth to this area, including significant levels of housing, improved employment opportunities and key infrastructure development. This included enhancements to public transport, including the Bus Rapid Transport, and highways improvements, including the Northern Distributor Road.
- 4.62 The NPA has been successful in directing growth to this area and ensuring the identified social and environmental benefits have been (or are being) successfully delivered. This has, in part, been due to the requirement for sufficient sites to be identified to meet the NPA housing requirement, and as such a 5-year housing land supply within the NPA to be maintained.
- 4.63 The SHMA, which forms part of the evidence base for this consultation, identifies that the NPA itself does not form a functional housing market area (HMA). While the GOCD acknowledges the role the NPA has played in the past it argues it is no longer appropriate for a NPA specific housing land supply to be required/monitored.

- 4.64 We disagree with this conclusion and consider the GOCD is confusing the role of a SHMA for the purposes of determining Housing Needs and a specific policy based area to ensure the right growth is delivered in the right locations.
- 4.65 While the NPA itself does not form a functional HMA, a slightly larger area, defined as the 'Core Area' (including Acle, Aylsham and Loddon) has been concluded to be a functional HMA. However, given no other settlements outside this area are sufficiently self-contained to establish a separate HMA (or areas), the SHMA concludes the most appropriate HMA, for the plan, is the Central Norfolk HMA.
- 4.66 Regardless of the HMA, the SHMA identifies the Core Area to be the area with the strongest functional connection to the Norwich Urban Area. On this basis, the Council's own evidence clearly supports the GNLP directing growth to this Core Area
- 4.67 As detailed in the Greater Norwich Technical Report (Appendix 2), and as summarised above, the NPA continues to represent a relevant area to direct growth, being an appropriate Travel to Work Area where future job growth will be focused. Given its continued high degree of self-containment it is questionable whether it is necessary for a new 'Core Area' to be defined.
- 4.68 **We strongly urge the GNLP to continue the approach set by the NPA in directing growth to a defined area (whether NPA or similar distinction) with the strongest functional relationship to Norwich. The boundary of this area should also reflect the preferred spatial strategy i.e. towards an A11 focus.**
- 4.69 Without a policy area focusing growth in key locations, there are **risks that the strategy will fail.**
- 4.70 As acknowledged as one of the key policy headings for the GNLP, in order to meet the plan's Visions and Objectives, the GNLP will promote the Cambridge Norwich Tech Corridor. The Cambridge Norwich Tech Corridor (initially proposed as the A11 Growth Corridor) began as a partnership between South Norfolk, Breckland and Forest Heath Councils. The Councils funded a comprehensive study of the corridor (Delivering the Economic Growth Potential of the A11 Corridor, Bruton Knowles, June 2016) which highlighted the potential for it to deliver significant economic growth by 2031, including 6,100 net additional jobs, many of which will be within high value employment sectors.

- 4.71 Since this time the partnership team has expanded to also include Cambridgeshire County Council, East Cambridgeshire District Council, Greater Cambridge Greater Peterborough LEP, New Anglia LEP, Norfolk County Council, Norwich City Council, St Edmundsbury Borough Council and Suffolk County Council.
- 4.72 The full economic and social benefits of the Corridor can only be realised if the GNLP provides significant support for this key growth location, including backing development opportunities within this Corridor and, importantly, ensuring sufficient housing is provided, in close proximity to existing and proposed employment opportunities.
- 4.73 Whilst it may be argued that the identification of specific sites will alleviate the need to for a policy area to direct growth, it is still deemed important that the area is defined, in the event that alternative sites are required to be relied upon to deliver houses or jobs in the event the allocated sites, for whatever reason, fail to deliver. This ensures the plan has the ability to respond rapidly to the market with the focus remaining on the growth locations.
- 4.74 A positively prepared, effective and justified Plan will need to ensure it has fully considered the potential benefits arising from the Cambridge Norwich Tech Corridor and, where necessary, supports its delivery. **The most appropriate strategic growth option will include the necessary measures to enable this.**

Q12) Do you support the long term development of a new settlement or settlements?

- 4.75 As part of the consultation, a New Settlements Topic Paper has been produced, supporting the GOCD which considers whether a new settlement could assist in meeting the plan's growth objectives. This is considered in response of 2no. sites, at Honingham Thorpe (site reference GNLP 0415 A to G) and West of Hethel (site reference GNLP1055) submitted through the 'call for sites' which could potentially support a new settlement including housing and other uses.
- 4.76 In order for a new settlement to be sustainable, and achieve the principles of being a Garden Village or Garden Town, it must be of sufficient scale to support a range of facilities and services, thereby being relatively 'self-contained'. The Government defines a Garden Village being a settlement between 1,500 and 10,000 homes and a Garden Town in excess of this.
- 4.77 The Topic Paper highlights that a minimum size for a new settlement will need to be 2,000 homes, being able to support a primary school and a small range of local shops and other services. Any site below this, not an extension to an existing urban area or large village, would consequently be an isolated group of houses in the open countryside, and therefore not sustainable.

- 4.78 The delivery of new settlements is risky and unpredictable, with the opportunities and constraints afforded by the submitted sites currently unknown until in-depth and detailed site investigation work has been undertaken. Furthermore, in order to deliver these settlements significant new infrastructure will be required, the costs of which need to be secured by way of legal agreement with landowners prior to allocation, to capitalise the uplift in land values.
- 4.79 The sites put forward, at Honingham Thorpe and Hethel, are not currently serviced by the infrastructure essential to support the necessary growth. The significant infrastructure, including highways and social infrastructure, would need to be delivered up-front. While this may be achievable in the long-term, especially if a necessary legal agreement is entered into, it is unlikely to be deliverable within this plan period.
- 4.80 While the delivery of a new settlement could be a suitable long-term aspiration of the plan, it is not considered appropriate for the emerging GNLP to rely upon it delivering housing in the current plan period.
- 4.81 Furthermore, it is not considered necessary for the GNLP to rely upon the delivery of a new settlement, as sufficient suitable and deliverable land, available adjoining existing sustainable settlements, has been identified.

5.0 SUITABILITY OF WYMONDHAM

- 5.1 Wymondham is the largest settlement in South Norfolk and is classified as a Main Town within the adopted JCS Settlement Hierarchy. Furthermore, Wymondham is one of the largest towns on the Cambridge Norwich Tech Corridor, with the A11 being located to the south and east of the settlement. The town is also located within the Core Area defined by the SHMA (and currently sits within the NPA).
- 5.2 The location of the town has good, well establish accessibility and connectivity to both Norwich and the employment opportunities on the A11 corridor, and existing high-quality services.
- 5.3 Wymondham (as a parish) currently has outstanding commitments of 2,674 dwellings, of which all the main committed sites have commenced development and are due to be completed by 2026. Furthermore, there are no known barriers to the completion of this development.
- 5.4 There continues to be a strong housing market in Wymondham with an ongoing demand for new homes.
- 5.5 As acknowledged in previous plan-making exercises, there are a number of continued constraints to growth of the town which remain a consideration for the GNLP. This includes the requirement to protect the historic core (including the Grade I listed Wymondham Abbey), consideration of landscape setting of the town and Secondary School capacity issues.
- 5.6 The adopted Wymondham Area Action Plan (WAAP, 2015) details 3 particular constraints, namely:

The Strategic Gap

A strategic gap has been defined to maintain the separation of Wymondham and Hethersett and safeguard the identity of each settlement. The importance of this gap is confirmed in Policy 10 of the JCS. Policy 4.7 of the Development Management Policies Document seeks to maintain the openness of the strategic gap between Wymondham and Hethersett and inappropriate development which has an unacceptable impact on the openness and separation afforded by the gap will not be permitted. Future growth to the north and north-east of Wymondham is therefore constrained.

Wymondham Abbey and the Historic Landscape Setting of the Town

Wymondham Abbey is a Grade I listed building and its ruins and surrounding meadows are designated as a Scheduled Monument. Wymondham Abbey is arguably the single most historic and important building in the whole of South Norfolk and safeguarding its setting is a critical consideration for the AAP. The importance of protecting the historic setting of the town and abbey is confirmed in Policy 10 of the JCS. Views of the Abbey tower can be seen from a considerable distance, particularly from the west and north-west, but there are glimpsed views from many other parts of the town. Future growth to the west of Wymondham is therefore constrained and development elsewhere (particularly in the south-western part of the town) would need careful consideration.

The capacity of Wymondham High School (Academy)

Wymondham High School (Academy) and Norfolk County Council (as Education Authority) are in agreement that the High School can accommodate additional pupil numbers from up to 2,200 new homes in the period to 2026, but no more. The school's site is constrained, and whilst investment plans are in place to accommodate the additional numbers, the school strongly wishes to retain both its playing fields and sixth form on one site. As an Academy, the scope for Norfolk County Council to 'dictate' admission policy and future expansion proposals is much more limited than for a grant maintained school.

- 5.7 The SPCD acknowledges these constraints, as well as the identifying a potential highways capacity issue regarding a bottleneck under the railway line which could further constrain development to the south of the town.
- 5.8 Regardless of these constraints, as the largest settlement in South Norfolk, a key location within the Core Area and Cambridge Norwich Corridor, and a location with high demand for new homes, Wymondham is a location where continued growth should be encouraged and allowed to occur.
- 5.9 The Site, at North East Wymondham, can deliver significant growth in a sustainable and suitable location which has regard to (where necessary) the limited number of identified constraints. This is detailed further in Section 6. It is not located in the Strategic Gap (save an expect an area of proposed Country Park) nor does it affect the setting of the Grade I Wymondham Abbey.

i) Secondary Education Capacity

- 5.10 As acknowledged within the WAAP, previous plan making exercises and relevant Inspector's Reports, there is a clear need to resolve secondary education capacity in Wymondham. The WAAP Inspector, in his report, acknowledged:

It will be necessary to review the planning and provision of school places in the light of any new housing requirement that extends beyond the current plan period and as planned housing development comes forward, including in Wymondham, Hethersett and Cringleford. This would allow appropriate long term decisions to be made about the location of new housing having regard to the planning of school places (and vice versa). This is a further matter which justifies an early review of the plan, particularly given the potentially lengthy lead in times necessary to plan for additional school places, should they be needed.

- 5.11 Whilst the lack of education capacity is, in itself not a valid reason for refusal (as confirmed at the Appeal relating to the Wymondham Rugby Club, Land West of Elm Farm Business Park and Land North of Carpenters Barn, Wymondham (ref. APP/L2630/W/3007004, 08 September 2016)), the continued lack of positively addressing the delivery of a new secondary school in Wymondham or indeed the south west sector is creating both a short term problem and exacerbating pressure on the existing school infrastructure.
- 5.12 As a result, the lack of school places is at odds with the requirement of para. 72 of the NPPF and para. 20 of the emerging NPPF which identifies education as a strategic policy required for each authority to plan for.
- 5.13 **It is therefore vital that the emerging plan acknowledges the severity of the education capacity issue, in Wymondham and the south-west sector and identifies this as a strategic priority for resolution.**
- 5.14 Furthermore, in order to achieve resolution, the plan will need to identify a suitable solution, through delivery of a new Secondary School.
- 5.15 **Should the proposed plan fail to adequately deal with this matter it risks being found unsound on the basis it will not be positively prepared, be unjustified and inconsistent with national policy**, including the proposed amendments to the NPPF which highlight education as a key provision of the strategic policies.

6.0 SUITABILITY OF LAND AT NORTHEAST WYMONDHAM

- 6.1 Land at North East Wymondham (the Site) has been promoted through previous plans, including the Joint Core Strategy and WAAP. The Site represents a sustainable location for development which will deliver a significant level of housing and, crucially, can deliver a solution to Wymondham's secondary education capacity constraint.
- 6.2 As identified throughout these representations, the GNLPP should seek to deliver growth within the Core Area and Cambridge Norwich Growth Corridor. The Site is located within both of these key areas. Furthermore, it is located within the existing Norwich Policy Area (NPA).
- 6.3 An indicative Masterplan for the site is included in **Appendix 1** demonstrating the site's context within its surroundings, including reflecting the planning permissions granted for residential and other development adjoining the site.
- 6.4 The site currently comprises circa 160 hectares of mainly agricultural land, extending from the A11 in the south, across Norwich Common and to Tuttle Lane in the north. In the main, the site is located outside the designated Hethersett – Wymondham Strategic Gap, with the exception of an area east of the site (identified for open space).
- 6.5 As demonstrated in the Masterplan, as well as delivering up to 1,500 residential dwellings (including affordable housing), the site could deliver mixed use/employment land, a local centre, land for a primary school / High School / All through school, allotments, significant areas of formal and informal open space included sports pitches and courts.
- 6.6 In addition, the site would allow the delivery of 'Kett's Oak Country Park' to the east of the town, seeking to enhance the setting of the historic Kett's Oak and improving public access and recreational opportunities to the countryside, a key policy objective (WYM 9) of the adopted WAAP.
- 6.7 The proposed site includes capacity for the provision of a new Secondary School site, located between Norwich Common and the A11. The location of the school would be ideally located, servicing the consented development (and proposed allocation) to the northeast of Wymondham, while remaining accessible to the remainder of the town and nearby villages, including Hethersett.

- 6.8 The delivery of a secondary school in Wymondham (or in the south-west sector of the NPA) is a strategically important matter. Therefore, the provision of a school site within the promotion land is considered to be a substantial benefit that the scheme can deliver, thus providing a solution to the persistent secondary education constraint which has continued through previous plan-making exercises.
- 6.9 Furthermore, as noted in the Site Proposals consultation report, no other HELAA sites in Wymondham or within the wider area have identified the potential to deliver a solution to the secondary school capacity issues that will arise through development to 2036. As such, the proposed allocation presents a unique and significant opportunity to achieve a strategic priority of the plan.
- 6.10 In regards to the other constraints identified in the Site Proposals consultation document and as detailed in Section 5, the site is located to maintain the separation of Wymondham and Hethersett with no residential development located within the strategic gap, the site is located away from Wymondham Abbey and the historic market town core, thereby ensuring the setting of these key heritage assets is preserved, and the site is well located to the existing highway network with no requirement for any off-site highway improvements relating to access under the railway line affecting south Wymondham.
- 6.11 The Site Proposals consultation document concludes that the least constrained sites within Wymondham are located to the north of the town, with the site (HELAA site GNLP0525) potentially suitable for significant growth.
- 6.12 This area, to the north of Wymondham, has been subject to a number of applications/appeals over the past decade, all of which have been granted/allowed and have or are shortly to commence development. These committed developments are shown on the indicative Masterplan.
- 6.13 Within this north east sector of Wymondham, on land promoted by the Promoters, delivery has historically been very strong. Over the past 12 years circa. 800 dwellings have been completed at varying rates. Most recently, at the Carpenters Barn site, 106 dwellings have been completed in the 12 month period (January 2017 - December 2017) by a single developer.
- 6.14 In addition, the site is located on the B1172 Norwich Common. This is on the proposed route of the Bus Rapid Transit route from Wymondham Railway Station to Norwich. This represents significant advantages of located development at the site and access to high quality public access. The delivery of further growth can assist in contributing towards the delivery of the BRT in this location.

- 6.15 The site, at 'Land at North East Wymondham' is deliverable, providing an appropriate location for growth which will help the GNLP achieve its Visions and Objectives. Crucially, the site provides a solution to the persistent Secondary education constraint in Wymomdham and across the south-west. The site is considered to be sustainable and located in proximity to existing services and facilities, as well as near to proposed employment opportunities along the Cambridge Norwich Tech Corridor. As such, it is considered a suitable site to be allocated in the GNLP.

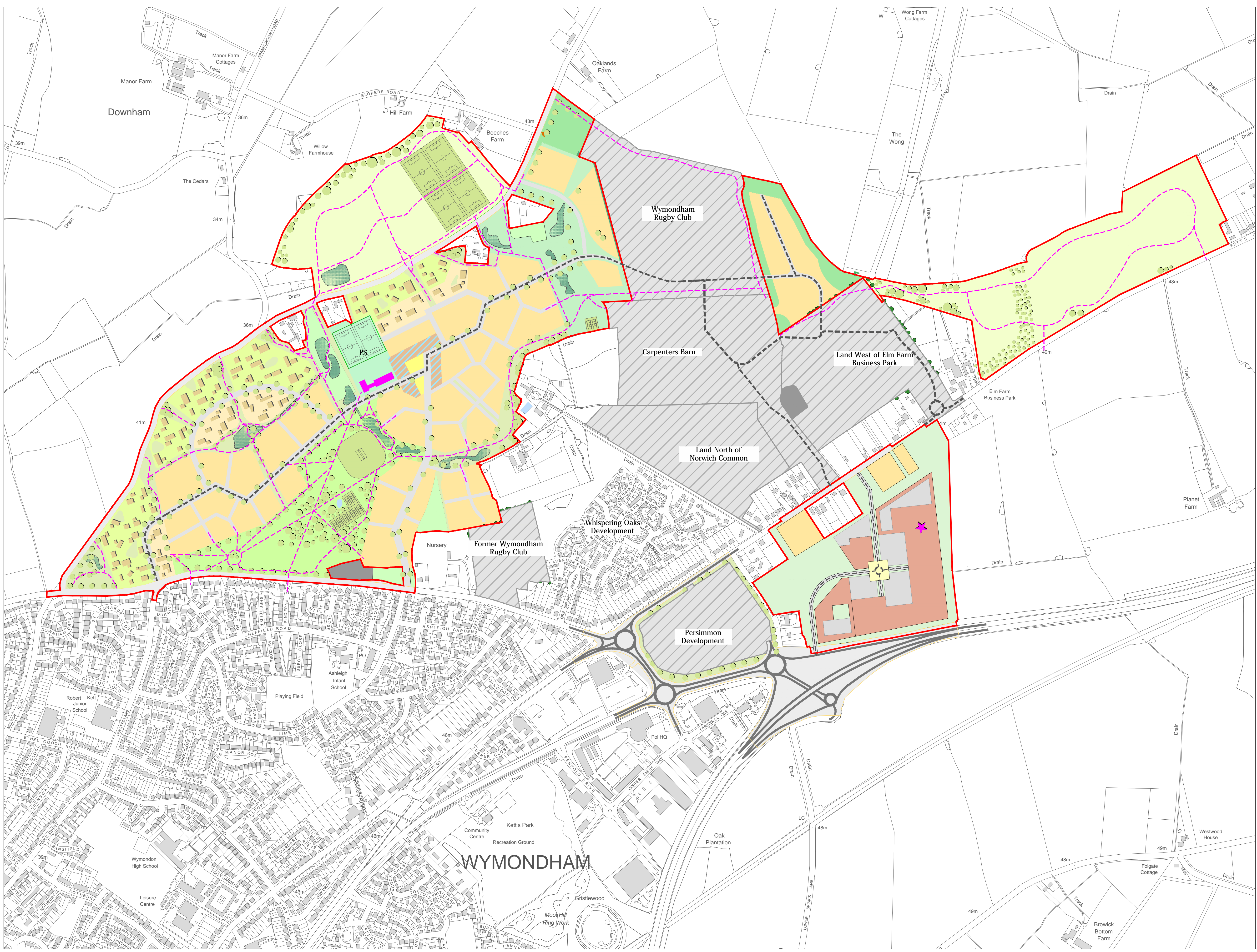
7.0 CONCLUSION

- 7.1 As acknowledged in the foreword to the Growth Options Consultation Document, well planned growth brings forward great benefits, providing high quality homes, jobs and infrastructure, while at the same time protecting and improving the environment. The current consultation sets out a number of potential 'Growth Options' which seek to successfully achieve the Visions and Objectives of the emerging plan.
- 7.2 As detailed in Para 182 of the NPPF, Local Plans will only be considered 'sound' where they are:
- Positively prepared – based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;
 - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - Consistent with national policy.
- 7.3 In order to meet the housing requirement, it will be necessary to allocate land for 7,200 dwellings, incorporating the proposed Standardised Methodology as the OAN starting point plus appropriate buffer.
- 7.4 The Strategic Housing Market Assessment demonstrates that a 'Core Area' exists, representing the strongest functional connection to the Norwich Urban Area. Evidence has been prepared and is included within this submission (Appendix 2) which highlights the continued importance of the NPA as a relevant area to direct growth. This area, or a similar distinction (i.e. Core Area) should remain the focus of growth and a Policy be prepared to that effect, similar to the existing NPA approach. The current Growth Options fail to consider the influence of the NPA/Core Area.
- 7.5 As well as housing delivery, a focus of the plan will be on the delivery of economic growth, in order to achieve the aspirations of the City Deal. Key to this, as acknowledged as one of the proposed Visions and Objective policy headings, will be the promotion of the Cambridge Norwich Tech Corridor. Focusing growth within the Corridor is vital to meeting the plan's Vision and Objectives and promote economic growth.

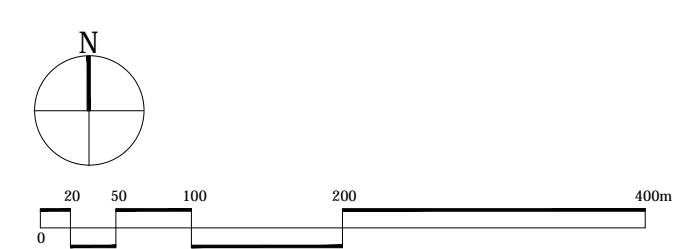
- 7.6 On this basis, we consider a hybrid version of Growth Options 2 and 3 should come forward as a preferred options, serving to ensuring the Core Area is supported with a focus for delivering development along the Cambridge Norwich Tech Corridor (A11). A proposed dispersal is included in Section 4.
- 7.7 Furthermore, the allocation of sufficient growth to Wymondham has the potential to resolve the ongoing Secondary Education capacity constraint currently affecting the south-west area, which is a strategic priority which must be dealt with through this plan-making exercise.
- 7.8 The site, at Land at North East Wymondham, represents a deliverable and suitable site for development which can assist the Plan in achieving its Visions and Objectives, within the Core Area and on the Cambridge Norwich Tech Corridor. Importantly, the site provides a solution to the ongoing education capacity issue. No other site has been identified to be able to provide this. As such, it should be allocated in the emerging Greater Norwich Local Plan.

APPENDIX 1

Illustrative Site Masterplan



- Legend**
- Site Boundary (159.70ha / 394.63ac)
 - Development
 - Mixed Use/ Employment
 - Low Density Development Edge*
 - Local Centre
 - Primary School
 - Square
 - Road
 - Strategic / Leisure Pedestrian and / or Cycleways Routes
 - Landscape Buffer / Open Space
 - Natural Green Space
 - Meadow Land
 - Allotments / Orchard
 - Town Park
 - Sports Pitches / Courts
 - Existing Uses to be Retained
 - Approved Development Schemes & Schemes Under Construction
 - Existing Landscape to be Retained
 - Proposed Tree Planting
 - Attenuation Ponds
 - Existing Water Bodies
 - Potential Secondary Education Facility
- * Graphic not Denoting Layout or Density of Development.



Project
**NORTH EAST WYMONDHAM,
 NORFOLK**
 Drawing Title
ILLUSTRATIVE MASTER PLAN

Date 10.12.13	Scale 1:5000@A1	Drawn by NO	Check by A.P.
Project No 21389	Drawing No 04	Revision C	



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APPENDIX 2

Annual Monitoring Report 2016 – 17 – Appendix A (March 2018)

Appendix A – Greater Norwich area Housing Land Supply Assessment 1st April 2017

Summary

This note sets out the housing land supply position for the Greater Norwich area as at 1 April 2017. The National Planning Policy Framework (NPPF) requires the three authorities to demonstrate a five year supply of housing land. The National Planning Practice Guidance (NPPG) advises that the assessment of housing land supply should be undertaken against the requirement figures within the adopted development plan where these are up to date and no significant new evidence has come to light.

The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. It establishes a housing requirement for Greater Norwich to 2026. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017. The SHMA is based on the most up-to-date evidence available and is a robust and accurate assessment of housing need. The SHMA assessment of housing need was included in the Norfolk Strategic Planning Framework (NSF). The NSF was widely consulted on in summer 2017 and was endorsed by the participating councils in February 2018.

When five year supply (plus the required 20% buffer in the NPA and 5% buffer in the RPAs) is considered against the SHMA assessment of Objectively Assessed Need (OAN) for housing, there has been a housing delivery surplus in the NPA and the residual rural area of Broadland and a relatively small housing shortfall in the residual rural area of South Norfolk. Against the SHMA OAN the authorities can demonstrate:

- 161.6% for the NPA (8.08 years / 5,368 home surplus);
- 298.8% for the Broadland rural area (14.94 years / 867 home surplus); and,
- a minimum of 87.6% for the South Norfolk rural area (4.38 years / 232 home shortfall)

When the five year land supply is calculated using the SHMA OAN, including uplift associated with the Greater Norwich City Deal, the authorities can demonstrate:

- a minimum of 136.4% for the NPA (6.82 years / 3,758 home surplus);
- 228% for the Broadland rural area (11.4 years / 728 home surplus); and,
- a minimum of 79% for the South Norfolk rural area (3.95 years / 431 home shortfall)

When the five year land supply is calculated using the JCS as its base, the authorities can demonstrate:

- 92.2% supply for the Norwich Policy Area (NPA) (4.61 years / 1,187 home shortfall);
- 963% supply for the Broadland rural area (48.15 years / 1,163 home surplus); and
- 1250% supply for the South Norfolk rural area (62.5 years / 1,496 home surplus)

There has been a significant and substantial increase in the size of housing commitment in Greater Norwich since the base date of the JCS. The JCS calculated total housing commitment to be 14,090 units at 1 April 2008; this compares to 35,687 units at 1 April 2017. This significant increase has occurred against a backdrop of 13,457 housing completions since 1 April 2008.

Between 1 April 2016 and 31 March 2017 2,251 dwellings were completed across Greater Norwich, of which 1,810 were in the NPA. The total deliverable housing land supply within the current 5 year period (1 April 2017 to 31 March 2022) is estimated to be 17,016 homes, of which 14,091 are within the NPA. In total there are currently sites with planning permission or in adopted local plans sufficient to deliver 28,480 homes by 2026, of which 24,784 are within the NPA. In combination with housing completions since 2008, the delivery of these sites would result in the JCS housing requirement being exceeded by 5,117 dwellings across Greater Norwich and 1,869 in the NPA.

Notwithstanding the existence or otherwise of a housing land supply, the Greater Norwich Authorities recognise that further housing land, above and beyond the existing commitments, needs to be identified to 2036. The authorities have committed to the production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Ahead of the adoption of the GNLP the authorities will continue to take a positive approach to development proposals that complement, rather than detract from, the existing and emerging development strategies, reflecting the presumption in favour of sustainable development.

Introduction

1. The National Planning Policy Framework (NPPF) seeks to boost significantly the supply of housing. To achieve this local authorities are required: to meet the *'full, objectively assessed needs for market and affordable housing in the housing market area'*; and, demonstrate *'a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements with an additional buffer of 5% ... to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20%'*.
2. The National Planning Practice Guidance¹³ (NPPG) states that requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating the 5 year supply and that considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light.
3. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk was adopted in March 2011, with amendments January 2014. It establishes a housing requirement for Greater Norwich to 2026. This housing requirement was to be monitored separately against a core Norwich Policy Area (NPA) and the two residual rural areas of Broadland and South Norfolk. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017.
4. Since its adoption in 2011, housing delivery in the NPA has not kept pace with the JCS housing requirement nor has it been possible to demonstrate a 5 year housing land supply. The absence of land supply persists despite the delivery of very significant increases in housing land supply commitments (the sum of planning permission and allocations of land). Housing delivery has however significantly exceeded the JCS housing requirements in the residual rural areas of Broadland and South Norfolk and a plentiful land supply continues to be maintained.
5. If measured against the more recent SHMA assessment of OAN there has been a housing delivery surplus in the NPA and the residual rural area of Broadland and there is a plentiful housing land supply. Within the residual rural area of South Norfolk there has been a relatively small housing shortfall and it is not possible to demonstrate a 5 year housing land supply.
6. The following sections of this report set out in more detail the issues that relate to housing land supply across Greater Norwich.
7. The tables 2 to 11 and the housing trajectories and forecasts included as appendices A to D set out the housing land supply position as at 1 April 2017 for the respective parts of the Greater Norwich area based both on the JCS housing requirements and the significant new evidence of housing need as contained in the 2017 Central Norfolk SHMA.
8. Notwithstanding the existence or otherwise of a housing land supply or the fact that housing commitments are at an all-time high, the Greater Norwich Authorities recognise that there is a need for the identification of further housing land above and beyond the existing housing commitments to 2036. The authorities have committed to the joint production of the Greater Norwich Local Plan (GNLP) to plan for these additional needs. Nevertheless, ahead of the adoption of the GNLP the authorities will continue to take a

¹³ Paragraph 30, ID: 3-030-20140306

positive approach, reflecting the presumption in favour of sustainable development, to development proposals that complement, rather than detract from, the existing development strategy.

9. Additionally, the Greater Norwich Authorities will continue to working closely with partners in the development sectors and the LEP and through initiatives such as the Local Infrastructure Fund and Housing Infrastructure Fund to stimulate delivery on committed development sites.

The starting point for calculating the 5 year supply - Housing requirement

10. As set out above, the NPPG advises that the assessment of housing land supply should be undertaken against the requirement figures within the adopted development plan where these are up to date and no significant new evidence has come to light.
11. The JCS, adopted March 2011 with amendments Jan 2014, establishes a housing requirement of 36,820 homes between 2008 and 2026, of which approximately 32,847 are planned for within the Norwich Policy Area (NPA). This results in an annual requirement of 2,046 for Greater Norwich, of which 1,825 need to be provided within the NPA.
12. The JCS housing requirement was established following an assessment of local need. The range of evidence sources that were used to derive the JCS housing requirement included the 2010 and interim 2011 DCLG population projections, the 2008 based household projections and the Spring 2012 update of the EEFM.
13. This evidence of local need, and the JCS housing requirement that was derived from it, was scrutinised as part of the independent examination of the JCS in 2013. On this matter the Inspector concluded that 'I am not convinced that the adopted JCS figure is so wrong that the amounts of housing proposed in this Plan need to be reduced or increased'¹⁴.
14. Significant new evidence on housing need, in the form of the Central Norfolk SHMA, was published in January 2016 and updated in July 2017.
15. The SHMA has been completed by leading consultants ORS in accordance with accepted best practice. The SHMA is the most up-to-date evidence of the Objectively Assessed Need (OAN) for housing in Greater Norwich. The SHMA uses a range of evidence that is significantly more recent than that which was used for the JCS, including the 2012 and 2014-based CLG household projections, 2014-based sub-national population projections and January 2017 update of the EEFM (EEFM 2016).
16. The Central Norfolk SHMA, July 2017 concludes that the Objectively Assessed Need (OAN) for housing in Greater Norwich is 39,486 homes. The OAN for the NPA is 30,593. This results in an annual requirement of 1,880 across Greater Norwich and 1,457 in the NPA. If the impact of the Greater Norwich City Deal is accounted for then the housing requirement in Greater Norwich increases to 44,714 or 2,129 per annum; in the NPA the housing requirement increases to 34,746 or 1,655 per annum.
17. The planning inspectorate has previously accepted the Central Norfolk SHMA as a reliable source of evidence on which the calculation of housing land supply should be based in North Norfolk.

¹⁴ See part JCS Inspector's report para 40.

Housing Shortfall

18. Since 2008 there has been a housing delivery shortfall against the JCS housing requirement in the NPA. By contrast there has been a housing delivery surplus in the residual rural parts of Broadland and South Norfolk. Tables 1 and 2 below set out housing delivery against the JCS housing requirement.

Table 1 Housing Delivery against JCS NPA Requirement

Year	Actual/Projected Completions	Required Completions	Shortfall/Surplus
2008/09	1,193	1,825	-632
2009/10	923	1,825	-902
2010/11	910	1,825	-915
2011/12	915	1,825	-910
2012/13	882	1,825	-943
2013/14	992	1,825	-833
2014/15	1,143	1,825	-682
2015/16	1,164	1,825	-661
2016/17	1,810	1,825	-15
Total 2008-17	9,932	16,425	-6,493

Table 2 Housing Delivery against JCS RPA Requirement

Year	Broadland Rural Area			South Norfolk Rural Area		
	Actual/Projected Completions	Minimum Required Completions	Shortfall/Surplus	Actual/Projected Completions	Minimum Required Completions	Shortfall/Surplus
2008/09	198	89	+109	345	132	+214
2009/10	109	89	+20	205	132	+73
2010/11	69	89	-20	189	132	+58
2011/12	70	89	-19	197	132	+65
2012/13	106	89	+17	250	132	+119
2013/14	139	89	+49	110	132	-22
2014/15	188	89	+99	345	132	+214
2015/16	258	89	+169	306	132	+174
2016/17	234	89	+145	207	132	+75
Total 2008-15	1,371	801	+570	2,154	1,188	+966

19. As a result of the housing delivery shortfall in the NPA when measured against the JCS, table 1, the housing requirement for the purposes of calculating 5 year supply in the NPA has risen from 11,320 in 2013 to 11,839 in 2014, 13,593 in 2015, 14,835 in 2016 and 15,277 in 2017. This increase is the result of delivery remaining below the JCS annualised target, albeit only by a marginal 15 units in 2016/17.
20. By contrast, if 5 year supply is measured against the 2017 SHMA assessment of Objectively Assessed Need (OAN) for housing the NPA requirement has actually reduced from 1,457 in 2016 to 1,454 in 2017 due to a housing delivery surplus. If the SHMA OAN including the impact of the Greater Norwich City Deal is considered the requirement has increased from 1,655 in 2016 to 1,672 in 2017 due to a small housing shortfall.

Housing Backlog

21. The Planning Advisory Service Good Plan Making Guide identifies that the SHMA should “re-set the clock” and provide a new baseline assessment of all housing need.
22. The Central Norfolk SHMA, July 2017, has fully considered the unmet needs of homeless and other households living in unacceptable accommodation (such as concealed families and sharing households) that existed in 2015. Furthermore, given that the SHMA also identifies all new housing need from the baseline date of 2015, all needs arising over the 21-year period 2015-36 have been identified and there will be no additional unmet need for housing to be counted for a new Plan with this base date.

Sources of Supply

23. There is no prescribed approach to the sources of supply that can be included within the assessment of housing land supply. The Greater Norwich assessment includes sites with planning permission, sites where there is council resolution to grant planning permission and sites that have been allocated in adopted Local Plans. In all cases the authorities have only included sites which are capable of being delivered in whole or in part within the 5 year housing land supply period.
24. To inform the assessment, each local authority has undertaken a site-by-site assessment for sites of 5 or more units, in conjunction with site owners, developers or agents where possible. All known sites with planning permission for less than 5 units are assumed to be delivered within the five-year supply period as they are clearly suitable and available for delivery in accordance with NPPF paragraph 47, footnote 11. Details of the larger sites are included in Appendices C (Norwich Policy Area) and D (Rural Areas).
25. The JCS does not rely on the provision of windfall development to meet objectively assessed needs. It is however reasonable, in accordance with paragraph 48 of the NPPF, to include an allowance for future windfall development in the assessment of 5 year housing land supply. The windfall figures used are based on past trends in the respective parts of the NPA and Rural Area and exclude garden land and sites that have specifically been released to address previous shortfalls in the 5 year land supply.
26. The JCS housing figures are presented on the basis of a Norwich Policy Area (NPA), made up of the city and those parts of Broadland and South Norfolk which relate most closely to the city, plus separate residual Rural Areas figures for Broadland and South Norfolk. Figures in this paper are also presented for the constituent parts of the NPA.
27. It is notable that overall land supply in the NPA within the five year period has risen from 9,535 units in 2013, to 11,317 in 2014, 11,926 in 2015 and 13,931 in 2016. In 2017 the overall land supply within the five year period is 14,091. This increase in land supply has been achieved despite a level of completions in the NPA between 2016 and 2017 that is significantly higher than at any point since 2008.

Student Accommodation

28. Students are included in the trend-based analysis that was used in establishing OAN in the Central Norfolk SHMA. Full time student numbers have grown by around 4,200 over the period 2005 to 2015. Consequently demographic projections assume that student numbers will continue to rise by 420 per annum for the 21 years from 2015 onwards.

29. Provided that the growth in student numbers is below 420 per annum, all student bedspaces can be counted as part of the housing land supply. The average size for a student household in the 2001 census was just over 3 students per household. Therefore, it would be reasonable to count each 3 student bedspaces as equivalent to 1 dwelling.
30. Research is ongoing into the number of bedspaces that have been delivered since 2015 and those that are likely to be delivered in the future. Therefore, at this point in time an estimate of the equivalent dwelling contribution of student bedspaces has not been included in the land supply. However, information on the provision of student bedspaces will be kept under review and if appropriate an update to this report will be issued.

Methodology for Calculating Housing Land Supply

31. Both locally and nationally there is considerable debate about the appropriate methodology for calculating housing land supply. The two main areas of contention are around how 'persistent under delivery' is defined and how previous shortfalls in delivery should be recovered.

Persistent Under Delivery

32. Up to the 2013/14 monitoring year the Greater Norwich authorities used the 5% buffer in calculating land supply, as required by the NPPF. It is clear that prior to the economic downturn, which affected completions from 2008/09 onwards, the relevant housing requirement for the NPA had been met. However it is acknowledged that since the economic downturn and the adoption of the significantly larger JCS housing requirements in 2011, there has been a persistent under-delivery of housing. As a result a 20% buffer is applied to the NPA housing requirement in accordance with NPPF paragraph 47. The 5% buffer remains appropriate for the two Rural Areas where delivery has been consistently and substantially above the JCS requirements. The 5% or 20% buffer would be applied to both the baseline requirement plus any housing delivery shortfall.

Liverpool vs Sedgefield approaches to recovering shortfall

33. The other main area of contention is how any housing delivery shortfall is dealt with; whether it should be met across the remaining plan period (the residual or 'Liverpool' approach) or met in full within the five year period (the 'Sedgefield' approach).
34. The JCS was prepared and is monitored in accordance with the Liverpool approach. This is clearly illustrated in the trajectory contained in JCS Appendix 6 and is made explicit in the definition of indicators in Appendix 815. Current government guidance allows for both methodologies to be used and the issue was the subject of debate at the part 2013 JCS Examination. On this issue the Inspector agreed with the Greater Norwich authorities that 'the shortfall should be added to the housing delivery target over the plan period' 16.
35. Since the adoption of the JCS the NPPG has been published (March 2014) which favours the use of the Sedgefield methodology. However, it does not require it; instead stating that Local Authorities should 'aim to deal with any undersupply within the first 5 years of the plan period where possible' (emphasis added).

¹⁵ Adopted JCS (January 2014), page 149, where the housing supply indicator is defined as 'CLG Core Output indicators H.2 a-d' which uses the residual approach.

¹⁶ 2013 JCS Inspector's Report, para 66

36. Subsequent to the publication of the PPG various site specific documents for South Norfolk and Broadland¹⁷ have been examined and found sound based on the Liverpool approach. The Inspector for the South Norfolk Site Specific Allocations noting that 'this is a reasonable, realistic and pragmatic approach, particularly given the reliance on larger strategic sites'¹⁸, similarly the Inspector for the Broadland documents concluded in both reports that 'I find that in this case the Liverpool approach is the most appropriate'¹⁹.
37. There is a strong logic to this approach. Having considered all reasonable alternatives in the plan preparation process it was determined that an approach involving a significant urban extension was the most appropriate option. This growth strategy is built around delivering significant new infrastructure, including the Northern Distributor Road, Long Stratton Bypass, new High School provision in the NE Growth Triangle, new Primary School provision at various locations, Bus Rapid Transit on key corridors, significant Green Infrastructure as well as a range of local enhancements.
38. It is very important that these major growth locations in Broadland and South Norfolk are not undermined by the release of a significant volume of smaller permissions that make little or no direct contribution to, and undermine the efficient and timely delivery of this key infrastructure. This issue is particularly significant in view of the extent of the backlog resulting from the prolonged downturn in the property market since 2008, which coincided with the base year of the JCS, which if the Sedgefield approach were applied could lead to a significant volume of permissions diverting investment away from the sites necessary to deliver the strategy.
39. Moreover, the approach to the application of the Liverpool approach in Greater Norwich is fully consistent with the national ambition to significantly boosting the supply of housing land. Meeting the revised JCS annual housing requirement already results in the need to identify a deliverable supply that is 60% above the baseline JCS housing requirement and doesn't leave a significant proportion of delivery to the last years of the Plan.
40. Therefore it remains appropriate to use the Liverpool methodology to monitor housing land supply where the JCS housing requirement is used as the starting point for the 5-year housing land supply calculation.
41. If the SHMA is used as the starting point for the 5-year housing land supply calculation in the NPA then there is only a housing shortfall, that needs to be recovered, in the SHMA OAN, including City Deals scenario. However, as there is an ample housing land supply across NPA under any SHMA scenario the question of the appropriate method to recover the shortfall is wholly academic.
42. There is also a housing shortfall identified in the South Norfolk RPA if the SHMA is used as the starting point for the 5-year housing land supply calculation. The appropriate method to recover will be considered separately, at this point in time a housing land supply cannot be demonstrated whichever method is used.

¹⁷ South Norfolk Site Specific Policies and Allocations Document; Wymondham AAP; Long Stratton AAP; Broadland Site Allocations DPD; and Growth Triangle AAP

¹⁸ Report on the Examination into the South Norfolk Local Plan (Site Specific Allocations and Policies Document, Development management Policies Document and Wymondham Area Action Plan), 28 September 2015

¹⁹ Report on the Examination into the Broadland Site Allocation DPD, 30 March 2016 & Report on the Examination into the Broadland District Growth Triangle Area Action Plan, 17 May 2016

Housing Land Supply in the Norwich Policy Area (NPA)

43. It has now been accepted at a number of appeals that under the JCS it is the whole NPA that is the relevant area over which the calculation of housing land supply should be made. Separate figures for constituent parts of the NPA will nonetheless continue to be published for monitoring purposes. Trajectories showing the deliverable housing land supply to 2026 is included as Appendix A2 to A5. The 5 year housing land supply of the NPA against the JCS requirement, SHMA OAN and SHMA OAN including the impact of the City Deals are in the tables below.

Table 3 NPA Housing Land Supply - JCS Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
32,847	JCS Plan Requirement 2008 - 2026			32,847
1,825	JCS Annual Requirement			1,825
16,425	Requirement 1 April 2008 to 31 March 2017			16,425
9,932	Completions 1 April 2008 to 31 March 2017			9,932
- 6,493	Housing Shortfall since 1 st April 2008			- 6,493
9,125	JCS 5 year requirement 2017/18 to 2021/22			9,125
3,607	6,493 / 9 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	6,493
12,732	9,125 + 3,607	Revised 5 Year Requirement	9,125 + 6,493	15,618
2,546	20%	Plus NPPF Buffer	20%	3,124
15,278	12,732 + 2,546	Total 5 year requirement 2017/18 to 2021/22	15,618 + 3,124	18,742
3,056	15,278 / 5 years	Revised Annual Requirement	18,742 / 5 Years	3,748
14,091	Supply of Housing			14,091
-1,187	15,278 – 14,091	Shortfall/Surplus of Supply	18,742 – 14,091	-4,651
4.61	14,091 / 3,056	Supply in Years	14,091 / 3,748	3.76

Table 4 NPA Housing Land Supply - SHMA OAN Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
30,593	SHMA OAN 2015 - 2036			30,593
1,457	SHMA OAN Annual Requirement			1,457
2,914	Requirement 1 April 2015 to 31 March 2017			2,914
2,974	Completions 1 April 2015 to 31 March 2017			2,974
+60	Housing Shortfall/Surplus since 1 st April 2015			+60
7,285	SHMA OAN 5 year requirement 2017/18 to 2021/22			7,285
-16	60 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	-60
7,269	7,285 - 16	Revised 5 Year Requirement	7,285 - 60	7,225
1,454	20%	Plus NPPF Buffer	20%	1,445
8,723	7,269 + 1,454	Total 5 year requirement 2017/18 to 2021/22	7,225 + 1,445	8,670
1,745	8,723 / 5 years	Revised Annual Requirement	8,670 / 5 Years	1,734
14,091	Supply of Housing			14,091
+5,368	14,091 - 8,723	Shortfall/Surplus of Supply	14,091 - 8,670	+5,421

8.08	14,091 / 1,745	Supply in Years	14,091 / 1,734	8.13
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Table 5 NPA Housing Land Supply - SHMA OAN, inc. City Deal Uplift Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
34,746	SHMA OAN 2015 - 2036			34,746
1,655	SHMA OAN Annual Requirement			1,655
3,310	Requirement 1 April 2015 to 31 March 2017			3,310
2,974	Completions 1 April 2015 to 31 March 2017			2,974
- 336	Housing Shortfall/Surplus since 1 st April 2015			- 336
8,275	SHMA 5 year requirement 2017/18 to 2021/22			8,275
88	336 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	336
8,363	8,275 + 88	Revised 5 Year Requirement	8,275 + 336	8,611
1,673	20%	Plus NPPF Buffer	20%	1,722
10,036	8,363 + 1,673	Total 5 year requirement 2017/18 to 2021/22	8,611 + 1,722	10,333
2,007	10,036 / 5 years	Revised Annual Requirement	10,333 / 5 Years	2,066
14,091	Supply of Housing			14,091
+4,055	14,091 - 10,036	Shortfall/Surplus of Supply	14,091 - 10,333	+3,758
7.02	14,091 / 2,007	Supply in Years	14,091 / 2,066	6.82

44. Table 3 above clearly shows that across the NPA the supply of deliverable land at 1st April 2017 continues to fall below what would be required under the JCS. By contrast, tables 4 and 5 clearly show that against the more recent SHMA assessment of housing need there is an ample supply of deliverable housing land in the NPA at 1st April 2017.
45. It should be noted that the supply of housing of 14,091 identified above represents only a part of the total housing commitment of 33,038 that existed in the NPA as of 1 April 2017. These sites within the larger housing commitment will continue to deliver beyond the 5 year supply period in order to meet overall requirement that are now being planned to 2026, and beyond.

Broadland and South Norfolk Rural Areas

46. Separate assessments of housing land supply are produced for the residual rural areas of Broadland and South Norfolk. Trajectories for these area are included as Appendices B1 and B2.
47. The 5 year housing land supply in the residual rural areas against the JCS requirement, SHMA OAN and SHMA OAN including the impact of the City Deals are shown in the tables below.

Table 6 BDC RPA Housing Land Supply - JCS Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
1,605	JCS Plan Requirement 2008 - 2026			1,605
89	JCS Annual Requirement			89
803	Requirement 1 April 2008 to 31 March 2017			803
1,371	Completions 1 April 2008 to 31 March 2017			1,371
+ 568	Housing Surplus / Shortfall since 1 st April 2008			+ 568
445	JCS 5 year requirement 2017/18 to 2021/22			445
-316	568 / 9 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	568
129	445 - 316	Revised 5 Year Requirement	445 - 568	- 123
6	5%	Plus NPPF Buffer	5%	6
135	129 + 6	Total 5 year requirement 2017/18 to 2021/22	- 123 + 6	-117
27	135 / 5 years	Revised Annual Requirement	-117 / 5 Years	-23
1,300	Supply of Housing			1,300
1,164	1,300 - 136	Shortfall/Surplus of Supply	1,300 - -117	1,417
48.15	1,300 / 27	Supply in Years	1,300 / -23	~

Table 7 BDC RPA - SHMA OAN Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
2,051	SHMA OAN 2015 - 2036			2,051
98	SHMA OAN Annual Requirement			98
196	Requirement 1 April 2015 to 31 March 2017			196
492	Completions 1 April 2015 to 31 March 2017			492
+296	Housing Shortfall/Surplus since 1 st April 2015			+296
490	SHMA 5 year requirement 2017/18 to 2021/22			490
78	296 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	296
412	490 - 78	Revised 5 Year Requirement	490 - 296	194
21	5%	Plus NPPF Buffer	5%	10
433	412 + 21	Total 5 year requirement 2017/18 to 2021/22	194 + 10	204
87	433 / 5 years	Revised Annual Requirement	204 / 5 Years	41
1,300	Supply of Housing			1,300
+867	1,300 - 433	Shortfall/Surplus of Supply	1,300 - 204	+1,096
14.94	1,300 / 87	Supply in Years	1,300 / 41	31.71

Table 8 BDC RPA - SHMA OAN, inc. City Deals Uplift Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
2,554	SHMA OAN 2015 - 2036			2,554
122	SHMA OAN Annual Requirement			122
244	Requirement 1 April 2015 to 31 March 2017			244
492	Completions 1 April 2015 to 31 March 2017			492
+248	Housing Shortfall/Surplus since 1 st April 2015			+248
610	SHMA 5 year requirement 2017/18 to 2021/22			610
65	248 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	248
545	610 - 65	Revised 5 Year Requirement	610 - 248	362
27	5%	Plus NPPF Buffer	5%	18
572	545 + 27	Total 5 year requirement 2017/18 to 2021/22	362 + 18	380
114	572 / 5 years	Revised Annual Requirement	380 / 5 Years	76
1,300	Supply of Housing			1,300
+728	1,300 - 572	Shortfall/Surplus of Supply	1,300 - 380	+920
11.40	1,300 / 114	Supply in Years	1,300 / 76	17.11

Table 9 SNDC RPA - JCS Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
2,368	JCS Plan Requirement 2008 - 2026			2,368
132	JCS Annual Requirement			132
1,188	Requirement 1 April 2008 to 31 March 2017			1,188
2,154	Completions 1 April 2008 to 31 March 2017			2,154
+ 966	Housing Surplus / Shortfall since 1 st April 2008			+ 966
660	JCS 5 year requirement 2017/18 to 2021/22			660
537	966 / 9 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	+966
123	660 - 537	Revised 5 Year Requirement	660 - 966	-306
6	5%	Plus NPPF Buffer	5%	15
129	123 + 6	Total 5 year requirement 2017/18 to 2021/22	-306+15	-291
26	129 / 5 Years	Revised Annual Requirement	-291 / 5 Years	-58
1,625	Supply of Housing			1,625
+1,496	1,625 - 129	Shortfall/Surplus of Supply	1,625 - -291	+1,916
62.50	1,625 / 26	Supply in Years	1,625 / -58	~

Table 10 SNDC RPA - SHMA OAN Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
6,844	SHMA OAN 2015 - 2036			6,844
326	SHMA OAN Annual Requirement			326
652	Requirement 1 April 2015 to 31 March 2017			652
513	Completions 1 April 2015 to 31 March 2017			513
-139	Housing Shortfall/Surplus since 1 st April 2015			-139
1,630	SHMA 5 year requirement 2017/18 to 2021/22			1,630
37	139 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	139
1,667	1,630 + 37	Revised 5 Year Requirement	1,630 + 139	1,769
83	5%	Plus NPPF Buffer	5%	88
1,750	1,667 + 83	Total 5 year requirement 2017/18 to 2021/22	1,769 + 88	1,857
350	1,750 / 5 years	Revised Annual Requirement	1,857 / 5 Years	371
1,625	Supply of Housing			1,625
-125	1,750 – 1,625	Shortfall/Surplus of Supply	1,857 – 1,625	-232
4.64	1,625 / 350	Supply in Years	1,625 / 371	4.38

Table 11 SNDC RPA - SHMA OAN, inc. City Deals Uplift Based

Liverpool	5 Year Housing Land Supply Assessment, April 2017			Sedgefield
7,416	SHMA OAN 2015 - 2036			7,416
353	SHMA OAN Annual Requirement			353
706	Requirement 1 April 2015 to 31 March 2017			706
513	Completions 1 April 2015 to 31 March 2017			513
-193	Housing Shortfall/Surplus since 1 st April 2015			-193
1,765	SHMA 5 year requirement 2017/18 to 2021/22			1,765
51	193 / 19 years x 5 years	Adjustment for Shortfall/Surplus	All in 5 years	193
1,816	1,765 + 51	Revised 5 Year Requirement	1,765 + 193	1,958
91	5%	Plus NPPF Buffer	5%	98
1,907	1,816 + 91	Total 5 year requirement 2017/18 to 2021/22	1,958 + 98	2,056
381	1,907 / 5 years	Revised Annual Requirement	2,056 / 5 years	411
1,625	Supply of Housing			1,625
-282	1,907 – 1,625	Shortfall/Surplus of Supply	2,056 – 1,625	-431
4.27	1,625 / 381	Supply in Years	1,625 / 411	3.95

48. Tables 6 and 9 above clearly shows that across the RPAs the supply of deliverable land at 1st April 2017 continues to significantly exceed what would be required under the JCS. Tables 7 and 8 also show that against the more recent SHMA assessment of housing need there is an ample supply of deliverable housing land in the BDC RPA at 1st April 2017. Tables 10 and 11 show that in the SNDC RPA there be a relatively small housing land supply deficit against both SHMA scenarios.

March 2018

Appendix A1 – Whole Greater Norwich Area Trajectory

		Completions										Projections										Total Delivered
		2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26			
Greater Norwich, all sites - 2008/09 to 2025/26																						
Past Completions	Actual Completions - Previous Years	1,736	1,237	1,168	1,182	1,238	1,241	1,676	1,728													
Future Supply	Actual Completions - Reporting Year																					
	Projected Completions - Current Year								2,251													
Requirement taking into account completions	Projected Completions - Future Years Existing Sites																					
	Managed delivery target - annual requirement taking account of past/projected completions	2,046	2,064	2,115	2,179	2,250	2,328	2,418	2,486	2,561	2,596	2,620	2,374	2,058	1,587	998	74	-2,303				
	JCS allocation annualised over 18 years (2008 - 2026)	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	2,046	
		Five Year Supply										Units										Total Required
		Liverpool Five Year Requirement plus 20% (6 yrs)										Units										36,820
												Unit Surplus Yrs										
												1,441										
												5.46										

Units	Units	Unit Surplus Yrs	Land Supply
17,016	3,943	1,441	5.46
15,575	3,115		

Appendix A2 – Whole Norwich Policy Area Trajectory

	Completions										Projections										Total Delivered	
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26				
Whole NPA, all sites - 2008/09 to 2025/26																						
Past Completions	1,193	923	910	915	882	992	1,143	1,164														
Actual Completions - Previous Years																						
Actual Completions - Reporting Year								1,810														
Projected Completions - Current Year									1,923													
Projected Completions - Future Years Existing Sites										2,570	2,746	3,334	3,518	3,101	2,644	2,280	2,668					34,716
Managed delivery target - annual requirement taking account of past/projected completions	1,825	1,862	1,921	1,988	2,065	2,156	2,253	2,354	2,473	2,546	2,624	2,613	2,468	2,206	1,908	1,540	799					
JCS allocation annualised over 18 years (2008 - 2026)	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825	1,825					32,847
	Five Year Supply																				14,091	Units
	JCS Five Year Requirement plus 20% (6 yrs)																				15,278	Units
																					-1,187	Unit Surplus Yrs
																					4.61	Land Supply

Appendix A3 – Broadland Norwich Policy Area Trajectory

	Completions										Projections						Total Delivered	Total Required	
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24			2024/25
Broadland NPA, all sites - 2008/09 to 2025/26																			
13 December 2017 Draft																			
Actual Completions - Previous Years	104	84	81	157	56	217	217	340											
Actual Completions - Reporting Year								410											
Projected Completions - Current Year									463										
Projected Completions - Future Years																			
Existing Sites										564	879	1,448	1,630	1,556	1,297	1,037	1,181		
Managed delivery target - annual requirement taking account of past/projected completions	617	647	682	722	762	817	867	926	984	1,048	1,201	1,255	1,216	1,112	964	798	559		
JCS allocation annualised over 18 years (2008 - 2026)	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617	617
									463	564	879	1,448	1,630	4,984					
									1,258	1,258	1,258	1,258	1,258	6,289					

Five Year Supply						
	463	564	879	1,448	1,630	Units
JCS Five Year Requirement plus 20% (6 yrs)	1,258	1,258	1,258	1,258	1,258	Units
						Unit Surplus
						Yrs
						Land
						Supply

Appendix A4 – Norwich Trajectory

	Completions										Projections						Total Delivered		
	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24		2024/25	2025/26
Norwich, all sites - 2008/09 to 2025/26																			
13 December 2017 Draft																			
Actual Completions - Previous Years	527	399	377	280	407	210	252	365											
Actual Completions - Reporting Year									445										
Projected Completions - Current Year										428									
Projected Completions - Future Years Existing Sites											902	675	797	914	495	462	488	832	
Managed delivery target - annual requirement taking account of past/projected completions	477	474	479	486	501	508	533	558	578	592	613	571	554	506	404	373	329	169	
JCS allocation annualised over 18 years (2008 - 2026)	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	477	8,592

Five Year Supply		428	902	675	797	914	3,716	Units
JCS Five Year Requirement plus 20% (6 yrs)		711	711	711	711	711	3,553	Units
	Unit Surplus						163	Yrs
	Land Supply						5.23	Supply

APPENDIX 3

**Greater Norwich Technical Report –
Economic Geography (Barton Willmore, March 2018)**

GREATER NORWICH TECHNICAL REPORT – ECONOMIC GEOGRAPHY

MARCH 2018

GREATER NORWICH
TECHNICAL REPORT – ECONOMIC GEOGRAPHY
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APPENDIX 1 – GVA/HACTH, NORWICH ECONOMIC ANALYSIS PART 1, COMMISSIONED BY NORWICH CITY COUNCIL

1.0 INTRODUCTION

1.1 This Technical Report has been prepared by Barton Willmore on behalf of Landstock Estates Ltd and Landowners Group Ltd.

1.2 The purpose of this report is to provide a robust evidence base to support representations being made to the Regulation 18 consultation for the emerging Greater Norwich Local Plan (GNLP). This report specifically responds to matters relating to economic geography, and identifies the functional relationships between places that should inform the approach to high level spatial planning within the GNLP. The report is structured as follows:

- Section 2, **Policy Context**, identifies the key aspects of national planning policy and guidance relating to the definition of housing/economic market areas and sustainable travel, as well as reviewing the spatial planning options put forward by the emerging GNLP;
- Section 3, **Functional Economic Relationships**, provides independent analysis of the economic linkages that exist within the GNLP, with a focus on travel to work flow patterns;
- Section 4, **Economic Outlook**, considers employment forecasts for the GNLP area, alongside economic themes emerging from the GNLP and initiatives such as the Cambridge Norwich Tech Corridor, to identify the spatial pattern of future employment growth within the plan area;
- Section 5, **Conclusions**, draws together the evidence summarised in the preceding sections, establishing the implications for spatial planning within the emerging GNLP.

1.3 An additional report prepared by GVA/Hatch on behalf of Norwich City Council is also provided at Appendix 1. The GVA/Hatch report covers similar themes to this report, and provides further evidence on the spatial economics of Greater Norwich.

2.0 POLICY CONTEXT

i) Current National Policy and Guidance

National Planning Policy Framework, March 2012

2.1 The National Planning Policy Framework (NPPF) makes numerous references to the need to fully understand development needs across the relevant geographic area, which does not necessarily correspond to an administrative boundary. Paragraphs 159 (Housing) and 160 (Employment) provide clear direction on this issue:

“Local planning authorities should have a clear understanding of housing needs in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries” (NPPF, Paragraph 159, Our Emphasis)

“Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area” (NPPF, Paragraph 160, Our Emphasis)

2.2 Sustainable development is central to the NPPF, and much of its content is geared towards achieving this objective. This includes promoting solutions which deliver environmental benefits such as reduced greenhouse gas emissions, reduced congestion and shorter journeys to work:

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.” (NPPF, Paragraph 30, Our Emphasis)

“Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.” (NPPF, Paragraph 37, Our Emphasis)

2.3 The NPPF clearly demonstrates a requirement for Housing and Economic Development needs to be assessed across geographic areas which reflect the extent of the market for each type of property. Within these markets, the NPPF is also clear that more sustainable spatial planning options should be preferred over less sustainable options, and this includes taking steps to minimise the distance residents need to travel to access employment, shopping and services.

Planning Practice Guidance, Housing and Economic Development Needs Assessments, March 2015

2.4 The Planning Practice Guidance (PPG) expands on the content of the NPPF, providing further details on how the approach of the NPPF is expected to be put into practice.

2.5 Building on the NPPF requirement to assess need across market areas, rather than simply within administrative boundaries, PPG states that:

“Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries.” (PPG, ID: 2a-007-20150320, Our Emphasis)

2.6 Further to this, PPG defines a housing market area in the following way:

“A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.” (PPG, ID: 2a-010-20140306, Our Emphasis)

2.7 PPG also provides a definition of markets for employment-sustaining commercial property:

“The geography of commercial property markets should be thought of in terms of the requirements of the market in terms of the location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area.” (PPG, ID: 2a-012-20140306, Our Emphasis)

2.8 Paragraph 12 then goes on to provide a list of factors which could be taken into account when defining a functional economic market area:

- **extent of any Local Enterprise Partnership within the area;**
- **travel to work areas;**
- **housing market area;**
- **flow of goods, services and information within the local economy;**
- **service market for consumers;**
- **administrative area;**
- **catchment areas of facilities providing cultural and social well-being;**
- **transport network.”** (PPG, ID: 2a-012-20140306)

- 2.9 Finally, PPG identifies the potential consequences of failing to provide sufficient homes in the correct locations to support economic growth (by failing to allow the labour force within the market area to grow sufficiently to meet demand):

“Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems.” (PPG, ID: 2a-018-20140306)

- 2.10 Though it is clear from both NPPF and PPG that housing and economic development needs should be assessed and then met across the functional market area, in reality the nature of planning means that a ‘best fit’ approach is often required – meaning that Housing Market Areas and Functional Economic Market Areas are normally based on the extents of one or more Local Authority boundaries. Nevertheless, it is important that this pragmatic necessity does not undermine the intention of national policy and guidance – to ensure that homes and business premises are located in the areas where they are needed.

ii) Draft Updates to National Policy and Guidance, March 2018

- 2.11 Following consultation on the Government’s Housing White Paper (entitled ‘fixing our broken housing market’) in late 2017, the Ministry for Housing, Communities and Local Government published a draft revised NPPF in March 2018, with consultation running until May 2018. Draft updates to the PPG were also published for issues relating to the major changes outlined in the draft revised NPPF.
- 2.12 One of the headline changes within the revised NPPF is the introduction of a standard approach to the assessment of housing needs. Whereas need was previously determined within Strategic Housing Market Assessments (SHMAs) on an HMA-by-HMA basis, following the principles of Objectively Assesses Housing Need (OAHN), the emerging standardised approach means that housing need for each local authority will be determined by a standard formula to be applied on a consistent basis nationally. As such, the role of the SHMA is likely to change, focusing more on determining the types of homes needed in each area rather than the overall number of homes.

- 2.13 Another key change being consulted on is the introduction of a 'statement of common ground' at the plan-making stage, which can be seen as reinforcing the Duty to Cooperate. According to the updated PPG, the purpose of the statement of common ground is as follows:

"A statement of common ground is a written record of the progress made by strategic plan-making authorities during the process of planning for strategic matters across local authority boundaries. It documents where effective co-operation is and is not happening, and is a way of demonstrating at examination that plans are deliverable over the plan period, and based on effective joint working across local authority boundaries. In the case of local planning authorities (including County Councils), it is also evidence that they have complied with the duty to cooperate." (Draft PPG, p.38, Our Emphasis)

- 2.14 According to the draft PPG, the statement should include justification for the geographic extent assumed:

"[A statement should contain...] A written description and map showing the location and administrative areas covered by the statement, and a justification for these areas" (Draft PPG, p.39)

- 2.15 Finally, draft PPG indicates an approach to determining which areas need to be included within the statement:

"The statement will need to cover the area which local planning authorities and Mayors or combined authorities with plan-making powers feel is the most appropriate functional geography for gathering of evidence and the preparation of planning policies." (Draft PPG, p40, Our Emphasis)

- 2.16 The draft revisions to national policy and guidance suggest that significant change is expected in the way that housing needs for functional market areas are identified. Nevertheless, it appears that cross-boundary working remains expected, and the introduction of the statement of common ground at the plan-making could result in more robust collaboration between groups of authorities.

iii) Emerging Greater Norwich Local Plan – Regulation 18 Consultation

- 2.17 As stated in the introduction section to this Technical Report, the Greater Norwich Local Plan (GNLP) is being jointly prepared by Norwich City Council, Broadland District Council and South Norfolk Council (alongside Norfolk County Council) – a group collectively known as the Greater Norwich Development Partnership (GNDP). As part of the Regulation 18 consultation on the GNLP, the GNDP has published a number of documents for consultation, including a Growth Options document and an Interim Sustainability Appraisal.

- 2.18 The Growth Options document sets out a range of high level spatial planning options that could form the basis of policy within the GNDP as it progresses towards examination and adoption.
- 2.19 Paragraphs 4.165 and 4.166 of the Growth Options document comment on the findings of the June 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) relating to Housing Market Area (HMA) definitions. Although the SHMA finds clear evidence of a 'core' HMA focused on the urban area of Norwich (and not dissimilar in extent to the long-standing Norwich Policy Area - NPA), the Growth Options document contends that only the wider area incorporating the three GNLP local authorities in full should be considered to represent an HMA. As a result, the document argues that it would be unreasonable to retain the NPA as a means of monitoring 5 year housing land supply.
- 2.20 According to the Growth Options document, there is a need to identify sites for an additional 7,200 homes, as a result of the difference between the Objectively Assessed Housing Need (OAHN) derived via the Government's Standardised Housing Need Assessment Methodology and the capacity of housing sites already permitted or allocated within earlier plans. It is beyond the scope of this Technical Report to assess the validity of this figure, and it is therefore taken as read.
- 2.21 Six options are advanced for how these additional homes could be delivered:
- Option 1: Concentration Close to Norwich;
 - Option 2: Transport Corridors;
 - Option 3: Supporting the Cambridge to Norwich Tech Corridor;
 - Option 4: Dispersal (to service and other villages);
 - Option 5: Dispersal plus New Settlement;
 - Option 6: Dispersal plus Urban Growth.
- 2.22 The Growth Options document considers all six options to be 'reasonable alternatives' to one another. Options 1-3, according to the document, are considered to be more sustainable (with homes being delivered closer to the Norwich urban area, where the largest number of jobs and services are located), whilst options 4 and 5 are considered to have a better chance of delivery (on the basis that some long standing allocations close to the Norwich urban area have not been brought forward), would increase the diversity of locations where development is expected to take place, and provide more opportunities for rural living. Option 6 is considered to be an intermediate option with features of all other options.

2.23 The document also discusses the future role of the defined geographic areas used with previous policies and evidence base studies, including the Norwich Policy Area (NPA), the Central Norfolk Housing Market Area (HMA), the Core Area within the HMA (p.53). As noted above, the revised NPPF is likely to see the role of HMAs change somewhat, but it will remain important that neighbouring authorities with strong links such as the GNDP authorities work together. Though the Growth Options document contends that the NPA should not continue to be used for planning purposes, it is considered reasonable that a Norwich centred policy area of some form could be used within the GNLP (pp.53-54).

iv) Policy Context – Key Issues

2.24 This section has highlighted the approach of national planning policy and guidance alongside the approach taken within the emerging GNLP. The key issues relating to economic geography and spatial planning emerging from the emerging GNLP, to be considered in further detail by this Technical Report, are:

- **The future role of the NPA** – The Growth Options document suggests that the NPA, in its current role, should not be retained. It is suggested, however, that a Norwich-focused policy area could be retained in some capacity.
- **The most appropriate option for allocating additional housing growth** – The Growth Options document also acknowledges a need to make additional housing allocations following the announcement of the Government’s standardised housing need assessment methodology. Six options are put forward, reflecting different approaches to spatial planning, and all are considered to be reasonable alternatives to one another.

3.0 FUNCTIONAL ECONOMIC RELATIONSHIPS

3.1 This section provides analysis of the functional economic relationships within the Greater Norwich area. As identified in Section 2, travel to work flows are a key indicator, reflecting the relationships between places where people live and places where people work. For the majority, travelling to work involves motorised transport of some form, be it private car use or public transport, and this therefore has sustainability implications.

i) Central Norfolk SHMA (2015 and 2017)

3.2 The Central Norfolk SHMA (2015, updated in 2017), is the key evidence base document relating to housing need for the GNLP area. Though the 2017 update is substantial, both documents take the same approach to defining Norwich's HMA and are therefore considered together.

3.3 The 2015 SHMA provides a full discussion of the steps taken to define an HMA for the Greater Norwich area. A number of different data sources are considered, including:

- NHPAU/CURDS – Geography of Housing Market Areas in England;
- Local Authority boundaries;
- Broads Authority boundary;
- Census 2011 Commuting Flows;
- VOA Broad Rental Market Areas.

3.4 ORS, the author of the SHMA, also produces a bespoke set of HMA definitions for the Norfolk/Suffolk area based primarily on Census 2011 data (with reference to some of the other data sources above). This HMA definition is defined by determining the self-containment of each settlement (i.e. the number of people who both live and work within a settlement). This highlights key locations which attract labour from outside, including Norwich, Great Yarmouth, Lowestoft, King's Lynn, Bury St, Edmunds and Ipswich. The extent to which smaller locations are attracted to these key locations is then established, allowing HMA boundaries to be defined once an acceptable degree of containment is reached at the HMA level.

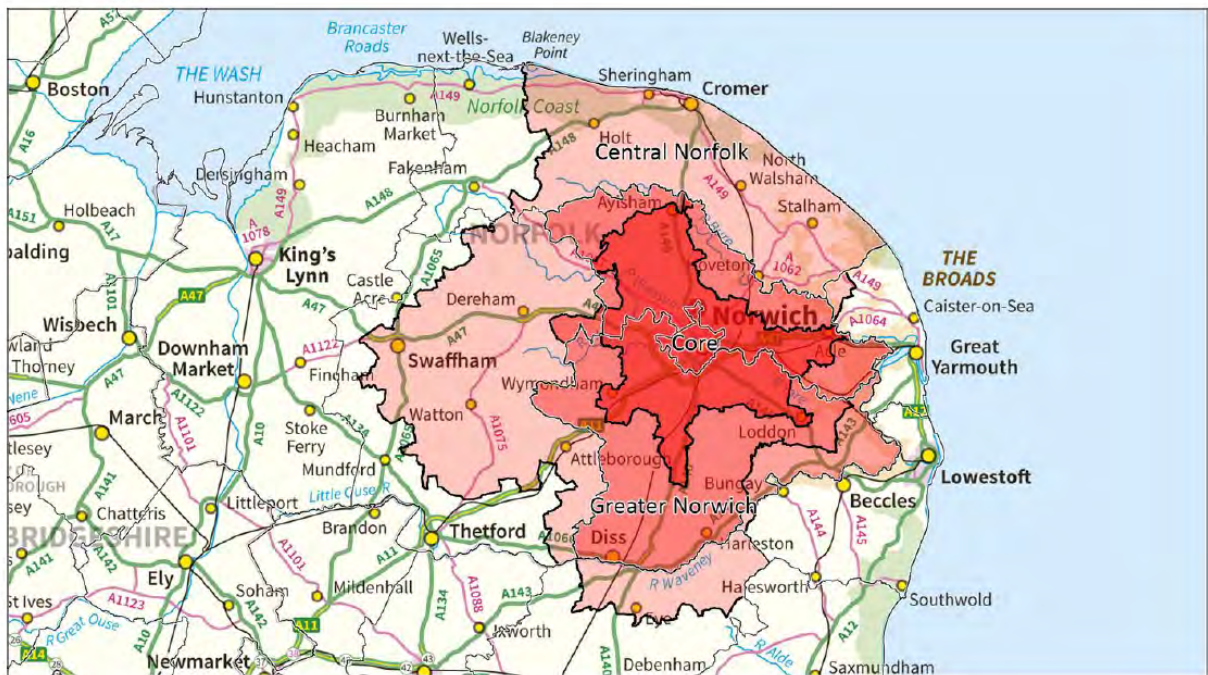
3.5 Ultimately, the SHMA recommends a three 'stage' HMA definition:

- Core – incorporating settlements with the strongest links to Norwich, and similar in extent to the NPA. According to the SHMA, 85% of home movers from the Core area remain in the core area;

- Greater Norwich – a version of the full Central Norfolk (see below) HMA, restricted to the boundaries of Norwich City, Broadland and South Norfolk;
- Central Norfolk – Full extent of the HMA, based on ORS analysis. According to the SHMA, 93% of home movers from this area remain in the same area.

3.6 These HMA definitions are shown on Figure 3.1 below:

Figure 3.1: SHMA HMA Definitions



Source: ORS, Central Norfolk SHMA 2015

3.7 In summary, the SHMA provides a robust justification for the HMA definitions it employs for the purpose of assessing housing need. Whilst the core area meets the requirements for representing a functional HMA for Norwich on its own, the remaining areas of the wider HMA are not sufficiently self-contained to be considered as separate HMAs. As such, it is important to consider need for both the core area and the wider area. Though the SHMA contends that the Central Norwich HMA (which incorporates the GNLPA authorities plus parts of a number of surrounding authorities), the Greater Norwich HMA is also considered a suitable definition for policy-making purposes.

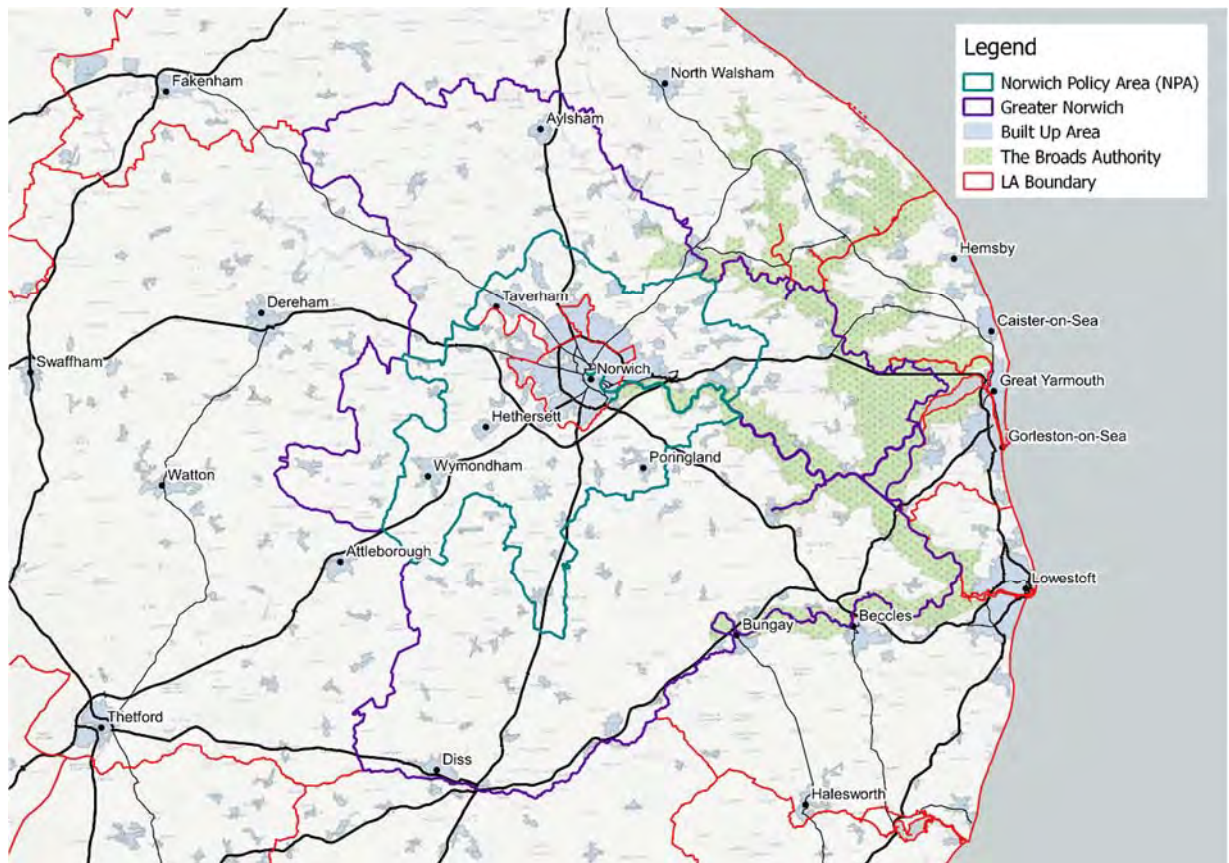
ii) Further Analysis

3.8 Though the 2015 Central Norfolk SHMA provides a robust defence of the HMA definition assumed, it is considered necessary to carry out additional independent analysis to respond specifically to the key issues identified in Section 2 of this report (the continued relevance of the NPA and the suitability of the six spatial planning options).

Context

- 3.9 Figure 3.2 below shows the extent of the existing Norwich Policy Area (NPA) within the Greater Norwich area. Major roads and larger settlements (with a population greater than 5,000) are also shown for context, as well as the boundaries of other Local Authorities and the Broads Authority.

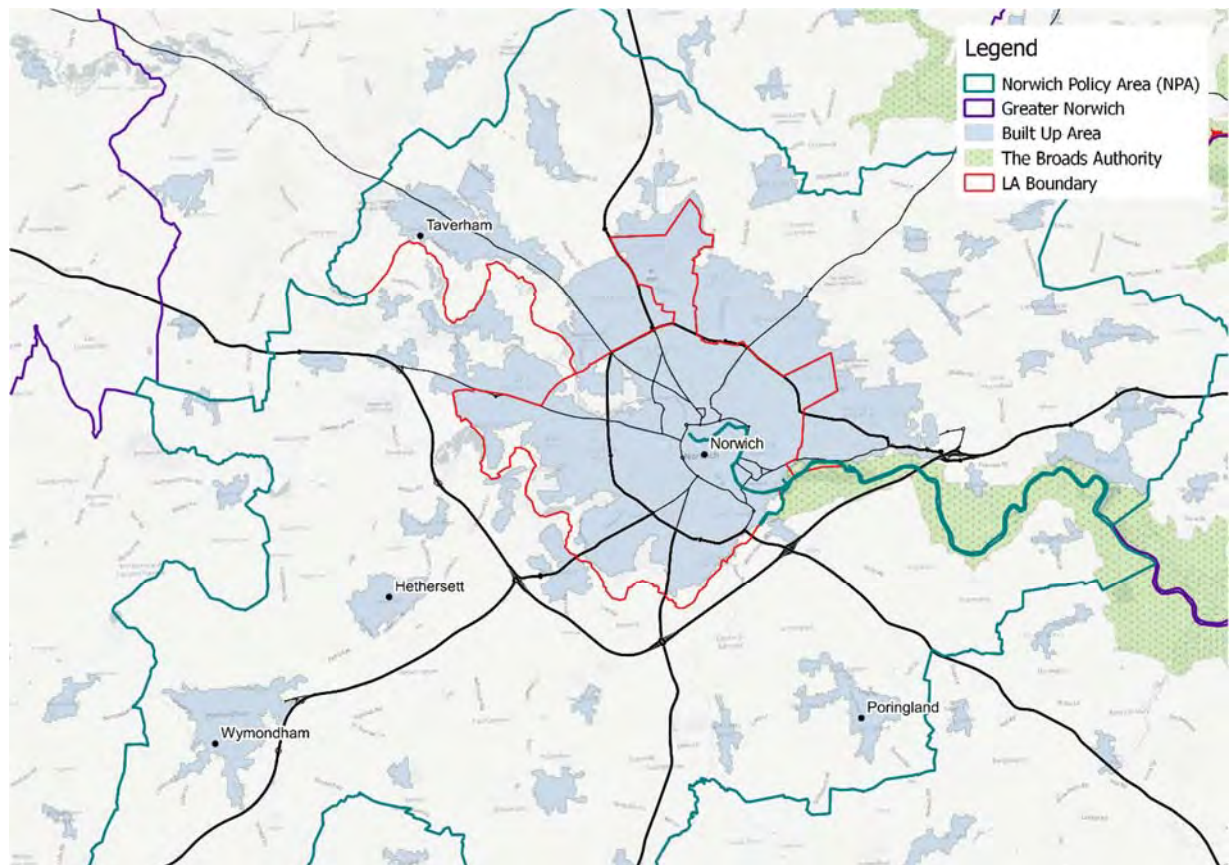
Figure 3.2: Context Plan



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- 3.10 The majority of larger settlements are located within the NPA; Diss and Aylsham are the only other settlements whose built up area populations¹ exceed 5,000 residents. Within the NPA, the largest built up areas outside of Norwich are Taverham and Wymondham, followed by Hethersett and Poringland.
- 3.11 Figure 3.3 below focuses on the Norwich urban area.

¹ Defined using ONS 2011 Built Up Area definitions

Figure 3.3: Context Plan – Norwich Urban Area

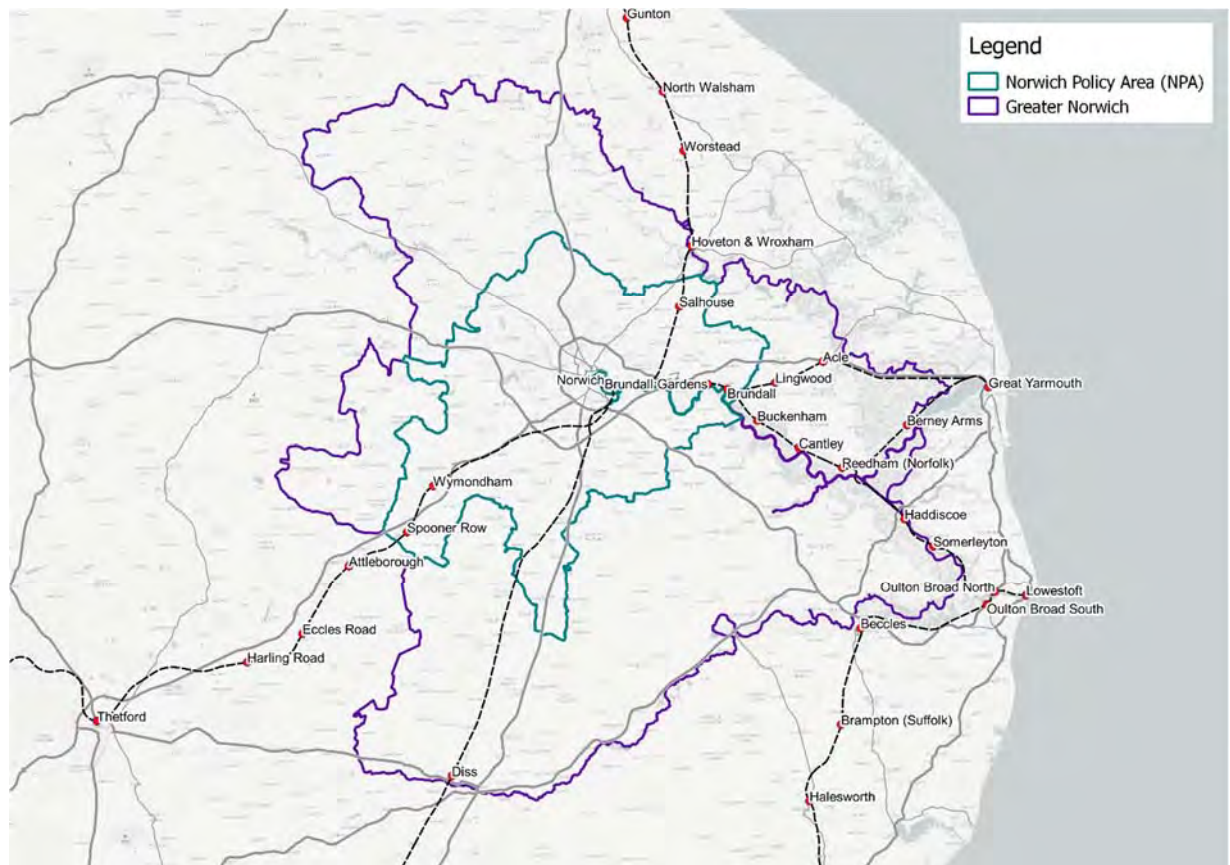
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- 3.12 From Figure 3.3 it is clear that the existing administrative boundary of Norwich City does not reflect the full extent of the city, resulting in large parts of the contiguous urban area falling within Broadland and South Norfolk. This is particularly apparent to the north of the city. One third of Norwich's urban area² (19 sq. km) falls outside of the City Council boundary (primarily in Broadland), accounting for 28% of the Built Up Area's population.

Travel to Work Flows

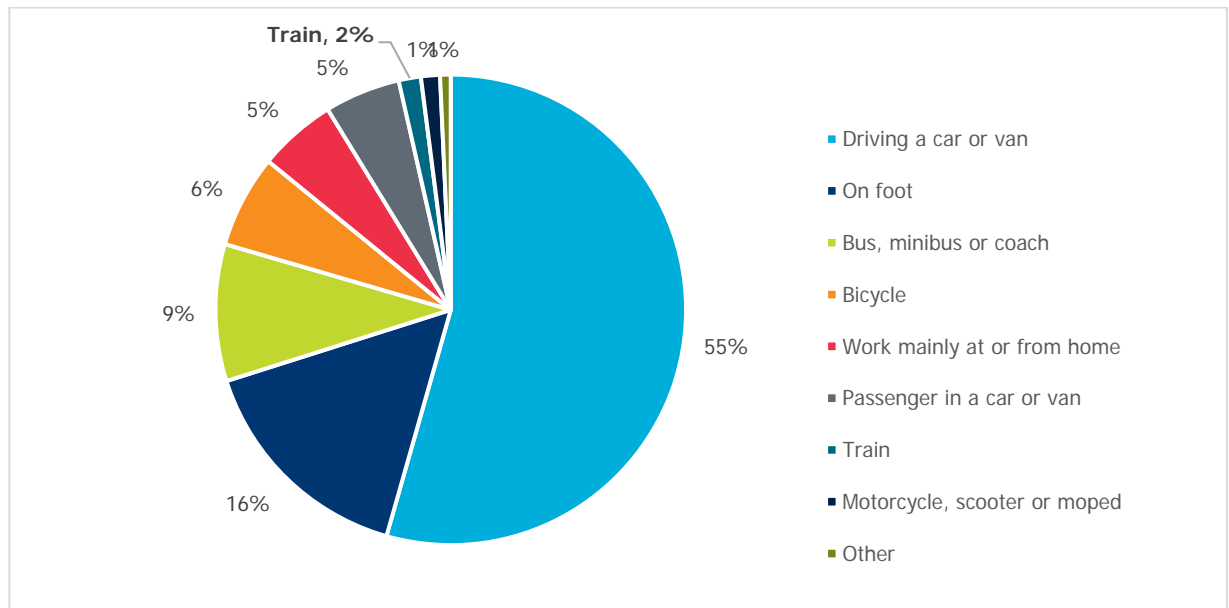
- 3.13 As highlighted in Section 2, spatial planning strategies should promote development in sustainable locations where travel times to employment, education and other services are minimised. Public transport use should also be encouraged. Figure 3.4 below shows the existing rail corridors within the Greater Norwich area.

² Based on the ONS 2011 Built Up Area Sub-division definition for Norwich

Figure 3.4: Rail Connections

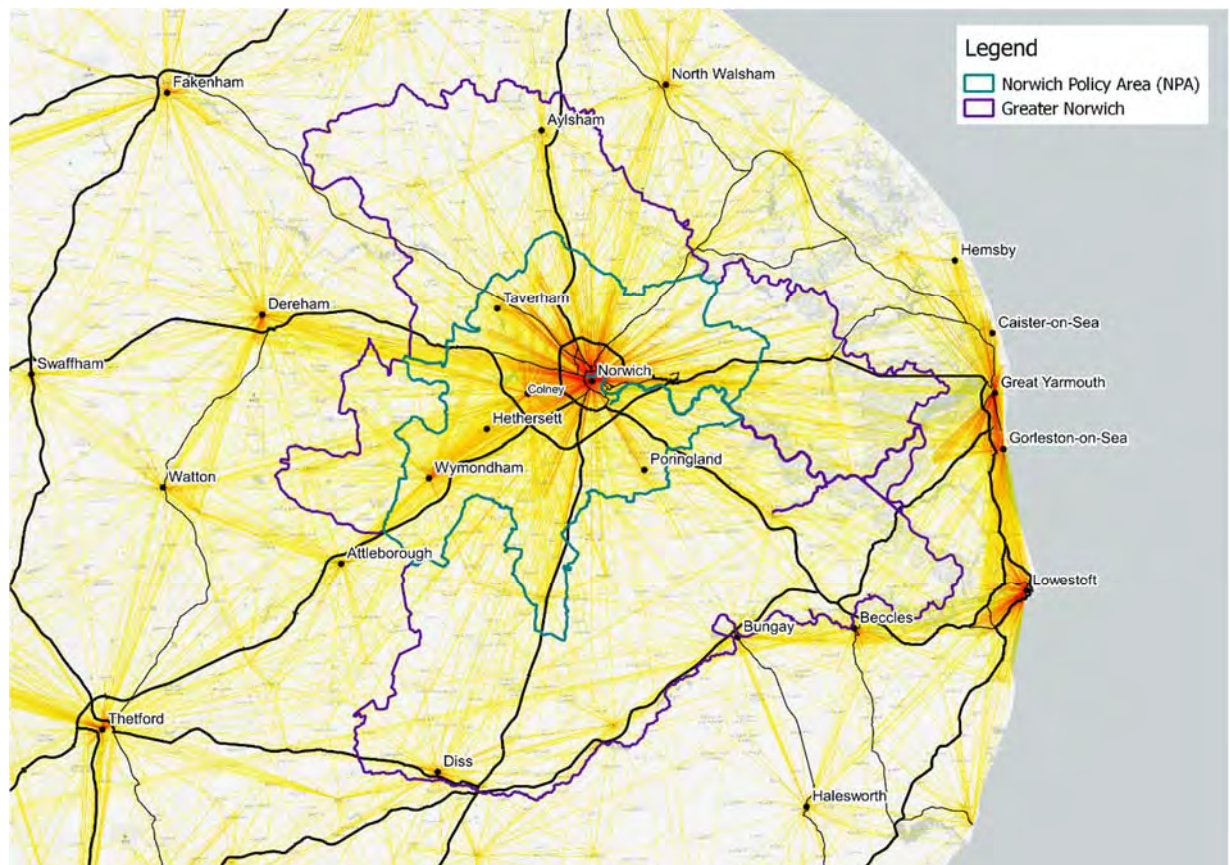
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- 3.14 Norwich serves as a hub for several lines, and benefits from direct links to London and other major destinations in the East of England and beyond. Though there are many stations along the rural lines to the north and east of Norwich, there are just five stations in total within the NPA: Salhouse to the north, Brundall Gardens and Brundall to the east, and Wymondham and Spooner Row to the south west.
- 3.15 Figure 3.5 compares the various methods of travel to work for those working at workplaces within Norwich City's administrative boundary, based on data from the 2011 Census.

Figure 3.5: Census 2011 – Method of Travel to Work (Jobs in Norwich City)

Source: ONS, Census 2011 - WP703EW - Method of travel to work

- 3.16 The lack of rail services serving the NPA means that less than 2% of Norwich workers arrive by train (less than half the national average of 5%). This suggests that scope may exist to encourage development in locations with railway stations. Bus use, however, is above average, and cycle commuting is more than double the national average.
- 3.17 Figure 3.6 below shows the patterns of commuting in and around Greater Norwich, based on analysis of origin-destination travel to work flow data from the 2011 Census.

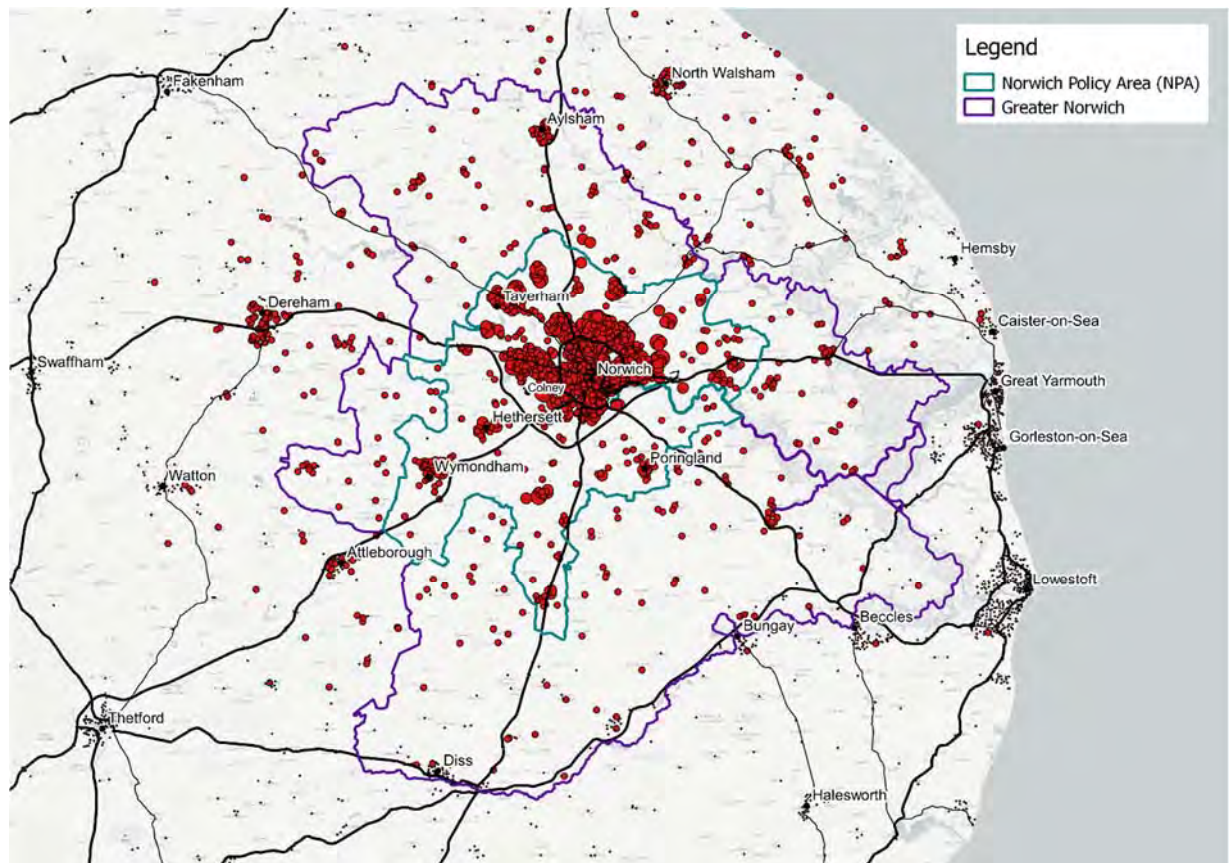
Figure 3.6: Travel to Work Flows

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Source: ONS, Census 2011

- 3.18 Norwich attracts strong commuting flows from within the NPA. Whilst the strongest flows appear to be contained within the A47, there are also strong flows along the main arterial routes into the city – particularly along the A11 from the south east. There are also some relatively strong flows from outside of the HMA – particularly from Dereham to the west (which falls within the SHMA’s wider Central Norfolk HMA). Conversely, relatively few people appear to be travelling from Diss, Bungay and Beccles on the southern edge of the HMA.
- 3.19 In addition to the main part of urban Norwich, the Colney area to the south west also attracts significant numbers of in-commuters, largely due to the presence of a number of large employers (including the Norfolk and Norwich Hospital, the University of East Anglia and the Norwich Research Park).
- 3.20 The influence of Norwich reduces with distance travelled. To the east, Lowestoft and Great Yarmouth have a greater influence on the coastal population than Norwich, whilst Fakenham and Thetford to the north west and south west respectively also appear to have relatively limited links to Norwich.

- 3.21 Figure 3.7 below isolates the data for Norwich, showing the home locations of those working within the Norwich urban area. Larger points indicate a greater number of Norwich workers resident in that area.

Figure 3.7: Origins of Norwich workers

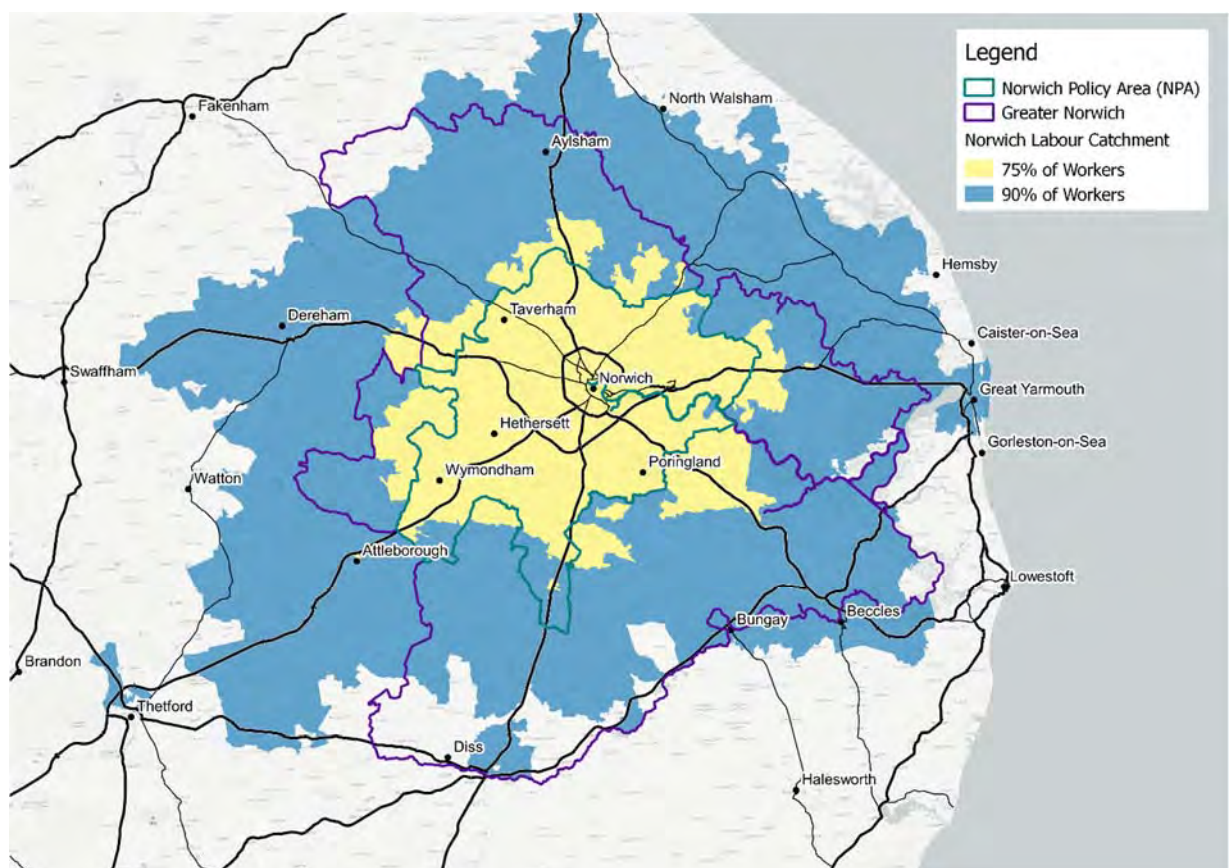


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Source: ONS, Census 2011

- 3.22 This analysis indicates that 71% of Norwich workers live within the NPA, and a further 10% live within the remainder of the Greater Norwich HMA, indicating containment of 81% within the HMA as a whole.
- 3.23 According to the ONS, an area with 75% self-containment and an economically-active population of at least 3,500 can be considered to represent a Travel to Work Area (TTWA), though containment rates as low as 66.7% are permitted for larger areas with economically-active populations in excess of 25,000 (as is the case here). As such, the NPA can be considered to broadly represent a TTWA.
- 3.24 As discussed in section 2, the NPA is an historic construct that has formed part of local planning policy in this area for decades following the introduction of Structure Plans in the 1970s. To test the continued validity of its extent, we have carried out further analysis of the travel to work flow data combined with drive time analysis.

- 3.25 For each flow originating from an 'output area' (a small unit of geography devised by the ONS statistical purposes) within 90 minutes' drive of Norwich³, the drive time into central Norwich has been calculated. This provides an indication of accessibility, taking into account factors such as availability and quality of infrastructure (i.e. the road network) and physical geography such as rivers, valleys and hills which affect route layout.
- 3.26 Travel to work flows are then ranked, from shortest to longest journey time. Containment thresholds 75% and 90% are then applied to create a 'catchment area' for Norwich's labour force. The 75% catchment area is equivalent to the containment rate of a TTWA (as discussed above). Beyond 90%, flows become more widely dispersed and of less practical use in defining the extent of Norwich's labour market. Figure 3.8 below shows the extend of these zones.

Figure 3.8: Norwich Labour Market Definition – Drive-Time Based



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Source: Experian, Off-Peak Drive Time model

- 3.27 The 75% catchment area is broadly similar in overall extent to the NPA, though extends slightly further along the main arterial roads. The 90% area, beyond which travel to work flows are more widely dispersed, demonstrates the wider influence of Norwich.

³ More distant flows have been excluded, as they do not represent typical, sustainable commuting behaviour

iii) Functional Economic Relationships - Summary

- 3.28 It is clear from the analysis above that there is a strong case in favour of a 'core' area being designated, where links into Norwich are strongest. Both the SHMA and our independent analysis have identified areas which broadly correspond to the extent of the NPA. Whilst functional economic relationships may have changed since the NPA was initially defined, it is questionable whether it is necessary to define a new core area given that the NPA continues to retain a high degree of self-containment.
- 3.29 The analysis in this section has also highlighted the important of transport infrastructure in directing growth. There are strong travel to work flows into Norwich along the main road routes into the city, though rail usage is very low among Norwich commuters owing in part to the lack of stations within the NPA.

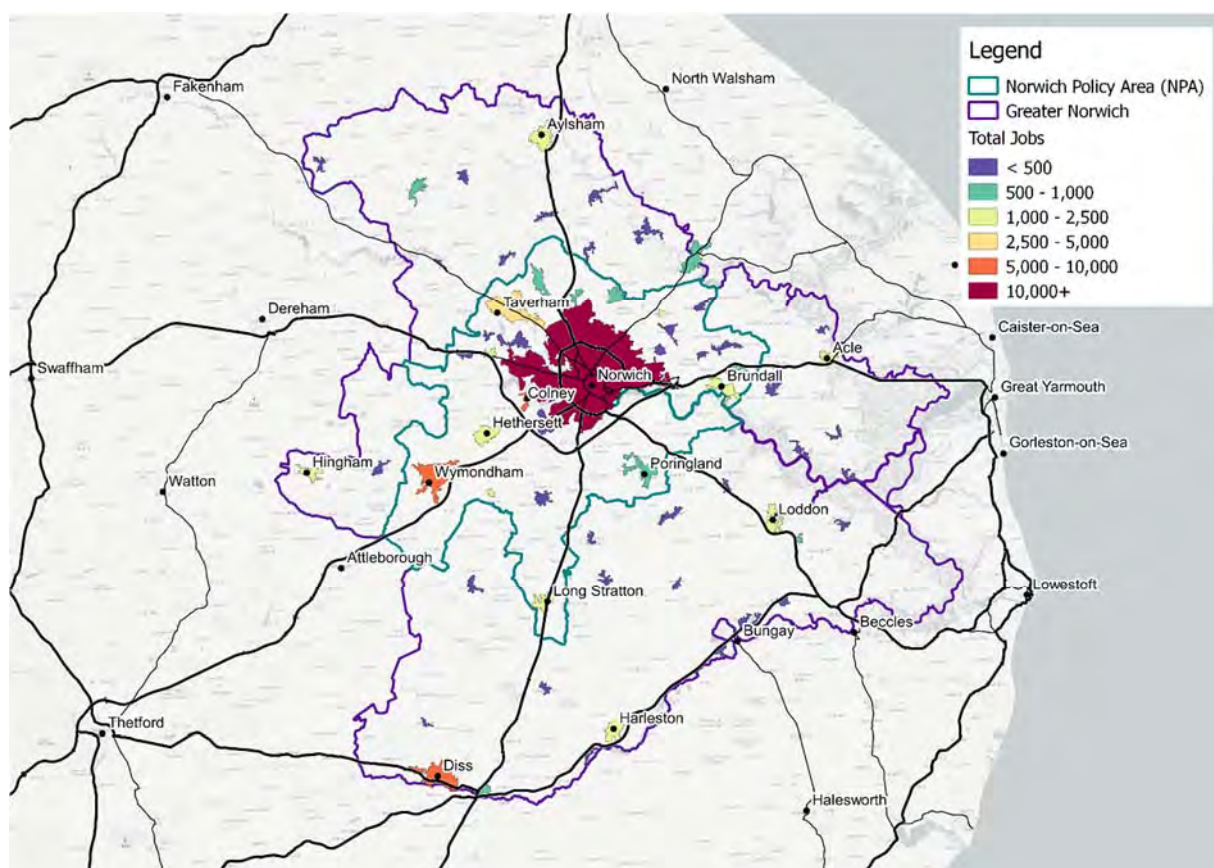
4.0 ECONOMIC OUTLOOK

4.1 The previous section reviewed the economic geography of Greater Norwich based on historic data, focusing on the functional relationships between Norwich as a workplace and the home locations of its workers. The future delivery of jobs, however, could have an impact where development needs to be located – particularly if growth is expected to be focused on other settlements.

i) Jobs Distribution

4.2 Figure 4.1 below shows the current distribution of jobs within Greater Norwich.

Figure 4.1: Current Distribution of Jobs



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Source: ONS, Census 2011 (Workplace Data)

4.3 At present, the areas⁴ with the most jobs are in and around the Norwich urban area. This includes areas such as Colney (to the south west of the city, where Norwich Research Park and Norfolk and Norwich Hospital are located). Beyond Norwich and its immediate fringe, the settlements with the largest numbers of jobs are Wymondham and Diss, followed by Taverham.

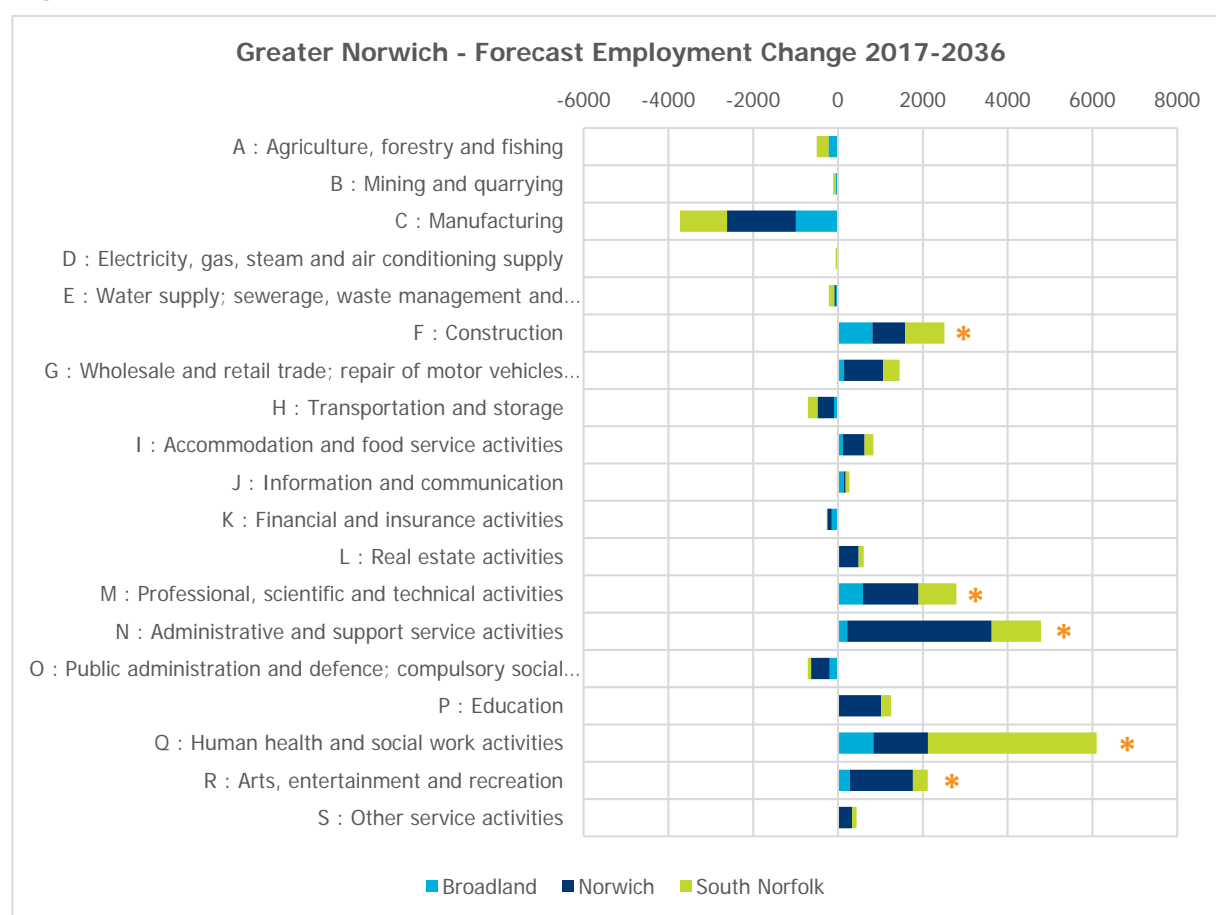
⁴ Built Up Areas and Built Up Area Subdivisions, as defined by the ONS

There are also a number of settlements within the NPA which fall within the 1,000 – 2,500 jobs bracket – namely Hethersett, Long Stratton and Brundall. According to the 2011 Census, 81% of jobs in the Greater Norwich area are located within the NPA and 66% within the Norwich urban area.

ii) Employment Forecast

4.4 In order to understand how the distribution of jobs within the Greater Norwich area might change over the course of the GNLP plan period, employment forecasts from Oxford Economics have been consulted. Figure 4.2 below summarises this forecast by sector.

Figure 4.2: Economic Outlook



Source: Oxford Economics

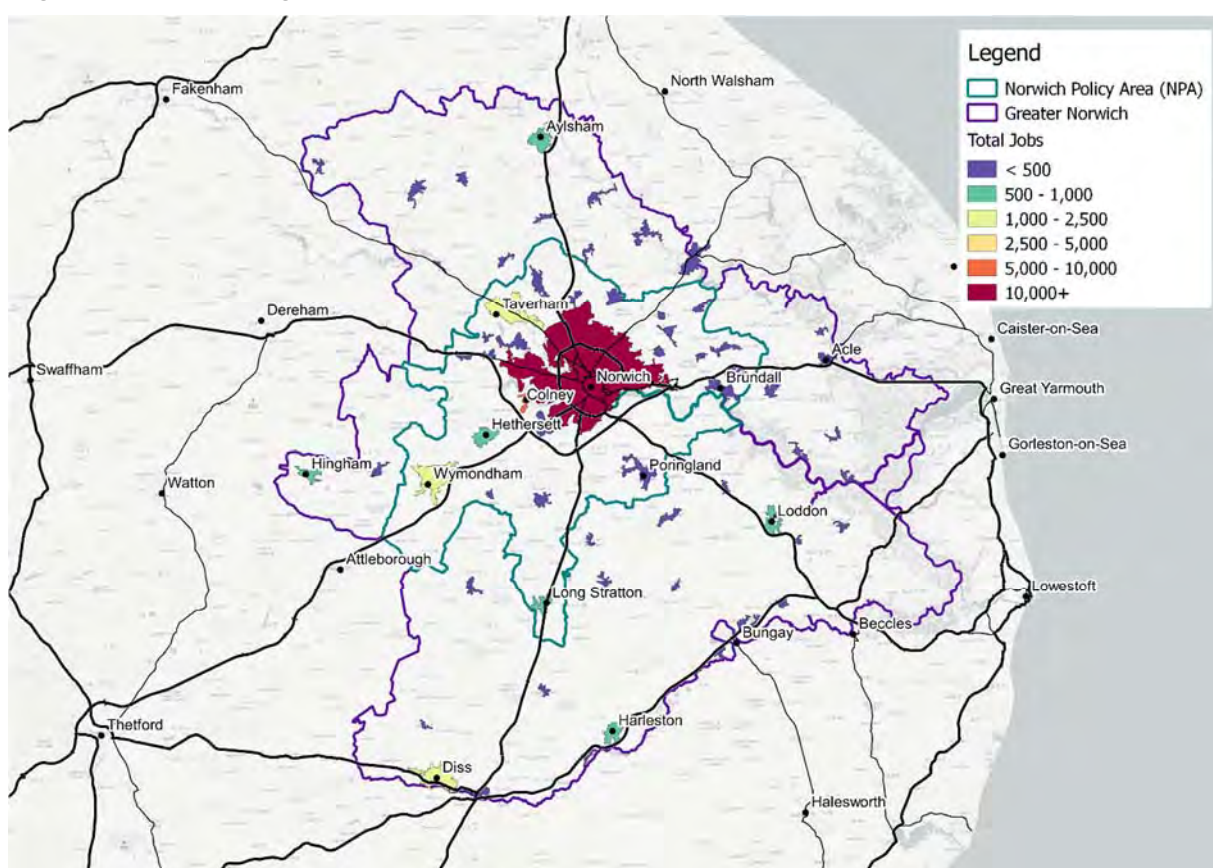
4.5 At the aggregate level, Oxford Economics forecast net growth in employment of c.17,000 over the course of the plan period, including net losses in a number of sectors (most notably Manufacturing – a national trend). The vast majority of jobs are expected to be created in Norwich and South Norfolk, with much more modest growth in Broadland.

4.6 At the sector level, a total of five sectors are expected to create more than 2,000 jobs over the plan period:

- Human Health and Social Work Activities;
- Administrative and Support Activities;
- Professional, Scientific and Technical Activities;
- Construction;
- Arts, Entertainment and Recreation.

4.7 The current spatial distribution of employment in these five main growth sectors, as observed in the 2011 Census, is shown in Figure 4.3 below.

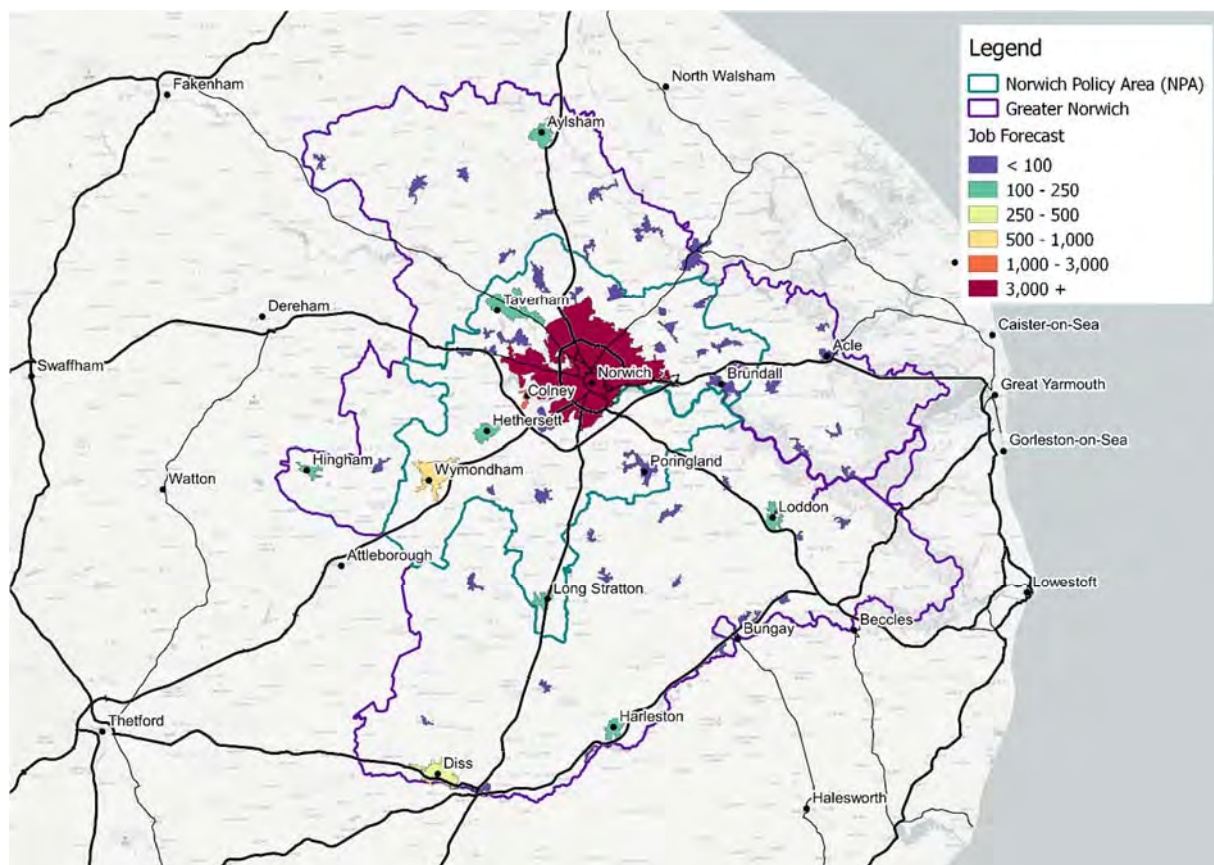
Figure 4.3: Existing Concentrations of Main Growth Sectors



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Source: ONS, Census 2011 (Workplace Data)

4.8 The vast majority (81%) of existing jobs in these main growth sectors are located within the NPA, with the Norwich urban area again accounting for the largest share (58%). Figure 4.4 shows how the forecast growth in these sectors might be distributed, assuming that job growth occurs in the same locations as existing jobs.

Figure 4.4: Forecast Distribution of Main Growth Sectors



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 Source: Oxford Economics, ONS - Census 2011 (Workplace Data)

- 4.9 Again, the spatial pattern of growth appears to emphasise locations within or close to Norwich, and a large majority (83%) of forecast jobs being located within the NPA (58% in the Norwich urban area).
- 4.10 Table 4.1 summarises the total number of jobs, total existing jobs in the 5 growth sectors and forecast growth across the 5 growth sectors for the 10 largest employment areas (by total number of jobs).

Table 4.1: Total Jobs, Growth Sector Jobs and Forecast Jobs

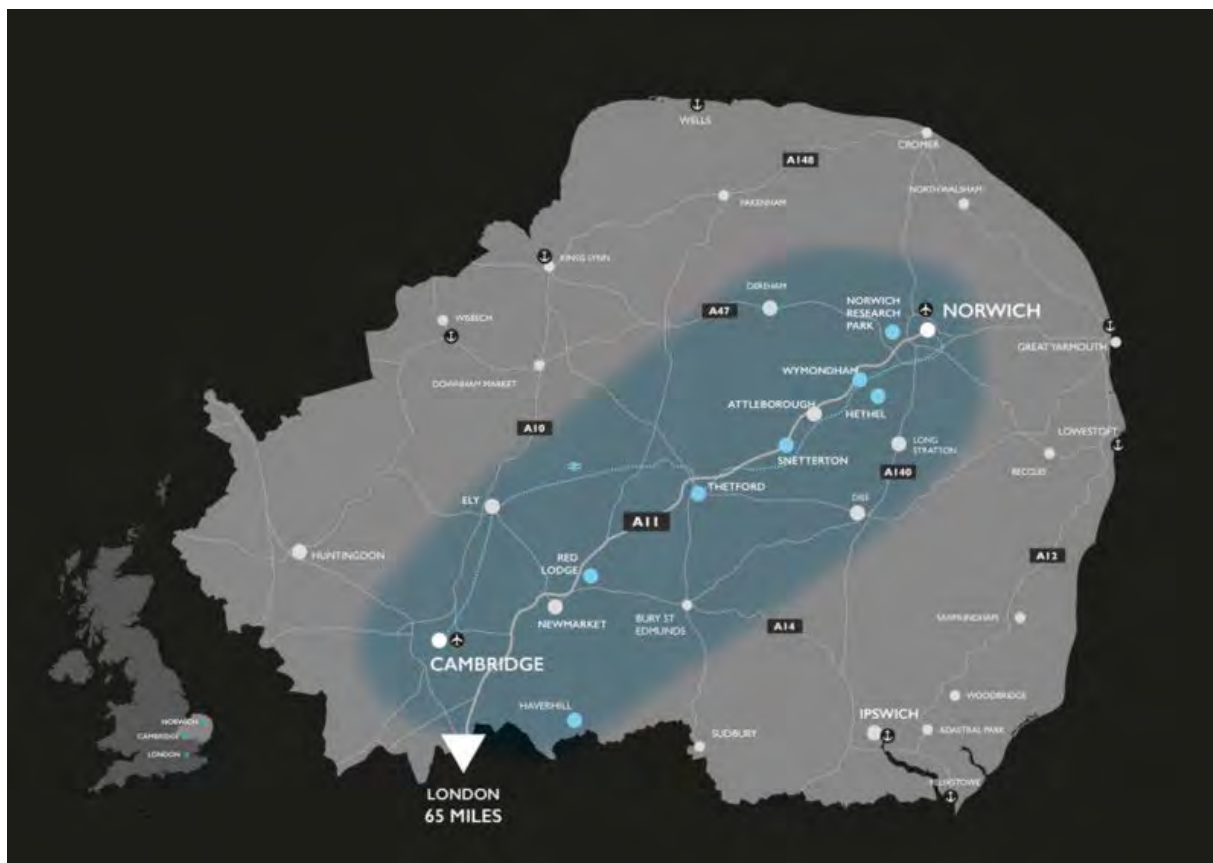
Built Up Area	Total Jobs (All Sectors)	Current Jobs (5 Growth Sectors)	Forecast Job Growth (5 Growth Sectors)
Norwich	114,200	37,100	9,750
Colney	8,700	7,950	2,700
Wymondham	7,200	2,400	700
Diss	5,300	1,650	450
Taverham	3,150	1,500	200
Aylsham	2,350	1,000	150
Long Stratton	2,250	800	250
Hingham	1,100	600	150
Harleston	1,650	550	150
Hethersett	1,600	550	150
<i>Others</i>	<i>25,500</i>	<i>10,150</i>	<i>2,100</i>
Total	173,000	64,250	16,750

Source: Oxford Economics, ONS - Census 2011 (Workplace Data)

- 4.11 The dominance of Norwich is clear, though there are also a number of smaller settlements such as Wymondham and Diss which also benefit from a strong employment base whilst remaining separated from the Norwich urban area.

iii) Further Growth Influences

- 4.12 The employment forecast from Oxford Economics analysed above is derived from a nationally-consistent forecast model, which is based primarily on national/regional outlooks for individual industry sectors and historic data at the local level. As such, the forecast does not take full account of policy interventions designed to promote above-trend growth. The GNLP acknowledges a number of external influences that have the potential to deliver additional growth, including the Cambridge Norwich Tech Corridor (CNTC) and the Greater Norwich City Deal.
- 4.13 Figure 4.5 below shows the area covered by the CNTC – a major initiative designed to promote the area as an attractive location for hi-tech firms in sectors such as digital, advanced engineering, biotech, life and environmental sciences and financial services.

Figure 4.5: Extent of the Cambridge Norwich Tech Corridor

Source: Cambridge Norwich Tech Corridor Partnership

- 4.14 In order to achieve this, the initiative aims to facilitate investment in strategic infrastructure (including an upgrade to the Ely North railway junction, which could result in a more frequent rail service along the corridor) and the delivery of 20,000 new homes.
- 4.15 A report in 2015 by Bruton Knowles and AMION Consulting identified that the corridor could create up to 8,700 net additional jobs in high value sectors (in alignment with the New Anglia LEP's economic development objectives), alongside an estimated 5,320 person years of temporary construction employment. This would deliver £558 million net additional Gross Value Added per annum and attract £905 million private sector investment in construction.
- 4.16 More recently, the CNTC initiative has predicted that its plans could create nearly 24,000 jobs⁵ in digital/tech sectors along the route, taking full advantage of its links to one of the World's top universities (Cambridge) and the very high qualification levels of residents (52% being university graduates). Within the GNL area, the Tech Corridor initiative highlights Norwich Research Park, Browick Road (Wymondham) and Hethel Technology Park as key locations for potential development.

⁵ <http://www.techcorridor.co.uk/about/>

4.17 In addition to the Tech Corridor, the GNL area also benefits from the Greater Norwich City deal, which supports the delivery of an estimated 19,000 jobs, including 3,000 high value jobs at the Norwich Research Park⁶.

iv) Economic Outlook – Summary

4.18 The economic outlook for the GNL area is positive, with a large number of jobs expected to be created over the plan period, including many high value jobs created through initiatives such as the CNTC and the Greater Norwich City Deal. The scale and ambition of the CNTC in particular has the potential to be transformative for the GNL area, providing Norwich with a clear link to the tech-driven economy of Cambridge.

4.19 Analysis of the spatial distribution of jobs within the GNL area demonstrates that the vast majority of current and future jobs are within the NPA. This highlights the importance of delivering housing growth as close as possible to key locations of economic growth.

⁶ <https://www.gov.uk/government/publications/city-deal-greater-norwich>

5.0 CONCLUSION

- 5.1 This Technical Report has reviewed the economic geography of Greater Norwich in the context of the emerging high level spatial planning policies of the Greater Norwich Local Plan. Specifically, the report has considered the continued relevance of the Norwich Policy Area (NPA) and the most appropriate option for allocating additional growth within the GNLP area.
- 5.2 The approach of national policy and guidance (in its current form) clearly promotes cross-boundary working and collaboration between local authorities that fall within objectively defined housing and economic market areas. There is also a clear preference for spatial planning options which promote sustainable travel – including travel to work. Though significant changes to national planning policy and guidance are currently being consulted on, it is not expected that the ambition for cross-boundary working and sustainable travel will be diluted.
- 5.3 The emerging GNLP is a collaboration between three local authorities that are demonstrably linked by economic geography. This is underpinned by detailed analysis contained within the 2015 Central Norfolk SHMA (and reiterated within the 2017 SHMA). Despite the strong evidence to support the existence of a core HMA (which is broadly similar in extent to the NPA) presented within the SHMA, the emerging GNLP is considering removing this level of HMA. The analysis contained within this Technical Report has provided further independent confirmation of the continued relevance of a defined area of focus comprising Norwich and the key settlements that support its economy.
- 5.4 A further report by GVA/Hatch, prepared on behalf of Norwich City Council (see Appendix 1), reaches a similar conclusion on the NPA:

“NPA is useful reference geography because, it closely aligns with the functional economic areas and the majority of assets that are of strategic importance are located within this area.” (GVA/Hatch, Norwich Economic Analysis Part 1, p.44)

- 5.5 The spatial options for accommodating additional growth have also been found to have varying levels of merit in the context of the national priority of supporting sustainable economic growth. Of the six broad spatial options put forward within the emerging GNLP, three rely on varying degrees of ‘dispersal’ to small settlements, including those outside of the NPA/Core HMA. The analysis contained within this Technical Report highlights that the vast majority of job creation over the plan period is expected to take place within the Norwich urban area, around the immediate urban fringes and along the A11 corridor. Initiatives such as the Cambridge Norwich

Tech Corridor will only serve to enhance the potential of this area, providing a clear link into the tech-driven economy of Cambridge.

- 5.6 In summary, this Technical Report has found that in order for the GNLP to respond positively to the sustainable development goals of the NPPF, the most appropriate spatial strategy to follow is one that delivers the right number of homes in sustainable locations close to where jobs are expected to be created.
- 5.7 It is also important that the strategy takes full account of economic development initiatives such as the CNTC and City Deal, which have the potential to deliver transformative change to the local economy – both in terms of the overall number and the quality of jobs.
- 5.8 Finally, it is crucial that development is focused on areas that are well connected to existing transport networks – particularly public transport networks – to ensure that future infrastructure investment is used efficiently.
- 5.9 On this basis, it is considered that Option 2: Transport Corridors and Option 3: Supporting the Cambridge to Norwich Tech Corridor are the most appropriate options for allocating additional growth. It is also considered that the NPA (or similar distinction) will continue to be of use to ensure that development is directed to the most appropriate locations in line with the analysis set out in this Technical Report.

APPENDIX 1

**GVA/HACTH, NORWICH ECONOMIC ANALYSIS PART 1, COMMISSIONED BY NORWICH
CITY COUNCIL**

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Norwich Economic Analysis

Part 1: Norwich Economic Geography

*Research commissioned by Norwich city
council into the functional economic
geography of Norwich and its growth
potential*

June 2017

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Prepared By: Martyn Saunders, Richa Joshi and Zak Vallender

Status: Version 1

Draft Date: June 2017

For and on behalf of GVA Grimley Limited

1. Introduction

- 1.1 This document has been prepared by GVA and Hatch on behalf of the Norwich City Council to provide a detailed economic assessment which demonstrates that Norwich and its wider urban area provides a core driver for accelerating the delivery of jobs and housing growth for the East of England. This supports the recent identification by Centre for Cities of Norwich as one of the “Fast Growth Cities” group.
- 1.2 To undertake this assessment the report has been divided into three parts:
- 1.3 **Part 1: Norwich Economic Geography:** This report is part 1 of this series, providing an overview of the multiple economic geographies of Norwich which include the local authority area, the urban area, the Norwich Policy Area (NPA), the Greater Norwich Area, Travel to Work Areas (TTWAs) and commuting patterns, and the Broad Rental Market Area (BRMA) and Housing Market Area (HMA). This review informs the use of the NPA as a study area or ‘reference geography’ that is used as the basis for analysis of the local economy in following sections and parts 2 and 3 of this series. This part of the series also assesses the commercial and housing property market, the role of infrastructure and growth locations as growth drivers, and how these come together as a cluster to form the engine of growth and development around the Norwich core.
- 1.4 **Part 2: The Norwich Policy Area: a dynamic, resilient growth oriented economy:** The second part of this series provides a review of the competitiveness of the Norwich economy within the UK and a detailed socio-economic overview of the NPA and its contributions to the regional and national economy. This part refers to current and historic data in addition to forecasts for the future to provide a comprehensive analysis of the strengths and weaknesses of the NPA economy. This analysis is based upon eight success factors that are attributed to resilient, adaptable and fast growing cities;
- Scale and Quality of Assets
 - Population, Workforce and Skills Base
 - Dynamic Enterprise Culture
 - Strong Representation in High Value Growth Sectors
 - Growing Capabilities in Key Technologies for the Future
 - An Attractive and Vibrant Urban Core
 - Opportunity Areas, Well Connected Sites and Premises
 - Leadership

1.5 **Part 3: Future Growth Sectors:** The third part identifies priority sectors within the NPA, based upon detailed quantitative analysis and stakeholder input, which are expected to deliver employment and productivity growth over the next 25 years. Each section within part 3 pertains to a particular priority sector and includes three sub-sections;

- *Sectoral Composition:* A review of employment within sub-sectors that make up the current priority sector and the role of key businesses and organisations;
- *Sectoral Change:* An analysis of the change of employment within a priority sector over the 2010 – 2015 period with comparison to other city economies;
- *Prospects for Growth:* A bespoke forecast, utilising projections developed by HATCH based on the Cambridge Econometrics EEFM, of prospective employment growth within sub-sectors that will drive future growth in the NPA.

1.6 The priority sectors that have been identified within the NPA include:

- Financial Services
- Life Sciences
- Advanced Manufacturing
- Food and Drink
- Digital Technology
- Creative Industries
- Knowledge Intensive Business Services (KIBS)

2. Geographies and Context

- 2.1 Norwich is a regional economic hub with a large catchment for homes, jobs and businesses. The city is home to more than 123,000 jobs and more than 8,000 businesses. Further, almost 50% of jobs are based in large companies and the city is one of the largest sources of employment in Greater South –East England (Norwich Economic Strategy, 2016). It is one of the key economic core cities in the east with connections to other regional economies such as Cambridge and London, and with international connectivity via ports and the Norwich Airport (Figure 1).
- 2.2 Norwich has a series of geographies that relate to its physical and economic footprint that do not neatly conform to its local authority area. Catchments for housing and labour often extend outside of cities and the Norwich local economic geography has long been recognised to expand beyond its institutional boundary. Further, these geographies change overtime as the local economy adapts, matures, and grows.
- 2.3 This section therefore sets out to review these geographies and draw out how each of these geographies shape and respond to the Norwich economy. This review will then be referenced to provide a study area that will form the basis of the subsequent analysis. This study area or ‘reference geography’ is not necessarily intended to represent a singular spatial definition of the Norwich economy but will provide a sufficient level of detail to capture its spatial and economic dynamics.
- 2.4 The geographic areas that are reviewed below include:
- Norwich Local Authority Area, the “City Centre” (i.e. the core of the city which accommodates the critical mass of commercial activity) and the Norwich “Urban Area” (i.e. broadly the contiguous built up area within the local authority areas of Norwich, Broadland and South Norfolk) – shown in Figure 2 below;
 - Norwich Policy Area;
 - Greater Norwich;
 - Norwich Travel to Work Area (TTWA);
 - Norwich Broad Rental Market Area (BRMA) and Housing Market Area (HMA).

Figure 1: Norwich Location and Strategic Connections



Key

-  Main Roads
-  Motorways
-  Rail Links

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 Broadland District Council – 100022319
 Norwich City Council – 100019747
 South Norfolk District Council – 100019483

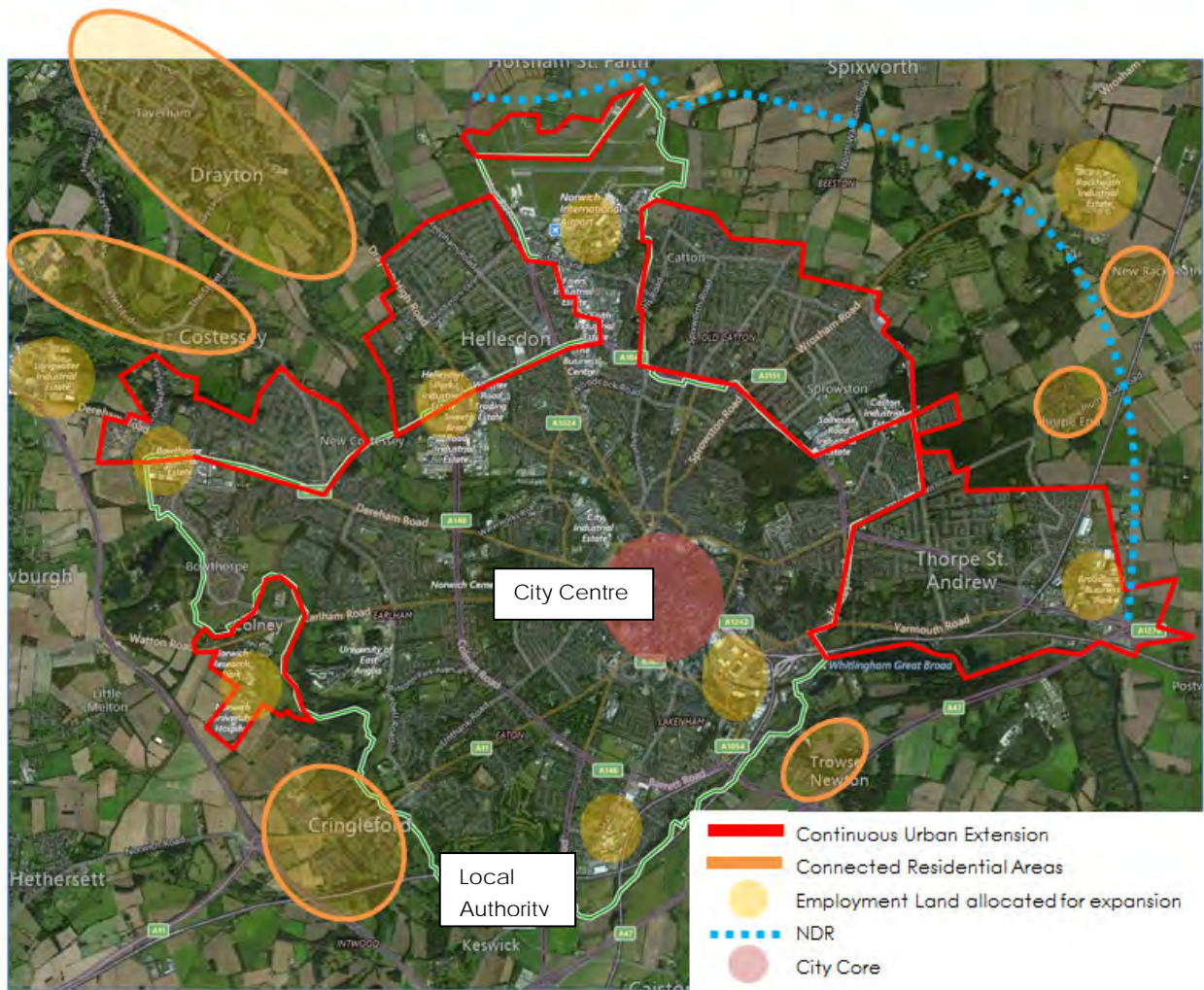
September 2009

Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Norwich City centre, Local Authority Boundary and Beyond

- 2.5 Norwich's city core, local authority area and periphery are shown in Figure 2. The City centre shown with a red circle includes the historic area, city centre and the core central area of Norwich. The Norwich local authority boundary is shown in green and the continuous urban footprint includes the periphery of the green bounded local authority area plus the areas outlined in red.
- 2.6 Clearly, a significant proportion of the "urban area" that is considered Norwich in fact falls outside of the City local authority area boundary. Much of the "urban area" that falls outside of the local authority area (those areas labelled as Continuous Urban Extensions on Figure 2) contains some of the largest commercial and residential locations and development opportunities. These include sites such as the Norwich Research Park, Rackheath, and Broadland Business Park. The Norwich City local authority area boundary also poorly captures some of the key infrastructure that serves and is planned to serve Norwich, such as the A47 and the Northern Distributor Route (NDR).
- 2.7 Given that many of these peripheral commercial locations provide high skilled jobs, much of Norwich's economic strengths are poorly captured by analysis conducted at the local authority level. Further, examples such as the recent move of some of Aviva's activity from the city centre to Broadland Business Park suggest that the city centre competes with the wider "urban area" and locations beyond it to attract businesses and to provide commercial floorspace.
- 2.8 These findings infer that the local authority area is not an accurate geography in seeking to understand or capture the true economic value or potential created by Norwich or the spatial and economic dynamics that play out in the area. It is also unlikely that the "urban area" (is sufficient to capture how businesses, jobs and housing locations are in direct competition around Norwich given that there are proximate commercial and industrial locations that do not form part of the Norwich's built-up/ continuous "urban area". It is instead likely that the economic influence of Norwich extends beyond this urban area.

Figure 2: Norwich (City Centre, Local Authority and Built Up Area)



Source: Bing, 2017.

Norwich Policy Area

2.9 The **Norwich Policy Area (NPA)** is a long standing spatial definition, devised in the mid-1970s and including the Norwich local authority and parts of Broadland and South Norfolk, which was designed to facilitate the management of growth driven by the city. Shown in Figure 3, the key objective for the NPA is to achieve a better local balance between homes and jobs so as to reduce the need to travel and to keep Norwich-related growth as close to the city as possible.

2.10 Figure 3 illustrates that the NPA is based on parish boundaries and includes settlements such as Wymondham and Long Stratton. These settlements are not considered part of Norwich city but have been recognised for their strong economic ties. Villages and other rural locations are unlikely to make large economic contributions to area but their proximity to Norwich, and distance away from any other large urban centre, suggests a dependence on and connectedness to Norwich in the form of access to services and employment.

2.11 The figure shows that the NPA captures the parishes within which the Norwich urban area falls and would better accommodate analysis of some of the spatial and economic dynamics that prove more challenging at the smaller local authority and urban area geographies.

Figure 3: Norwich Policy Area

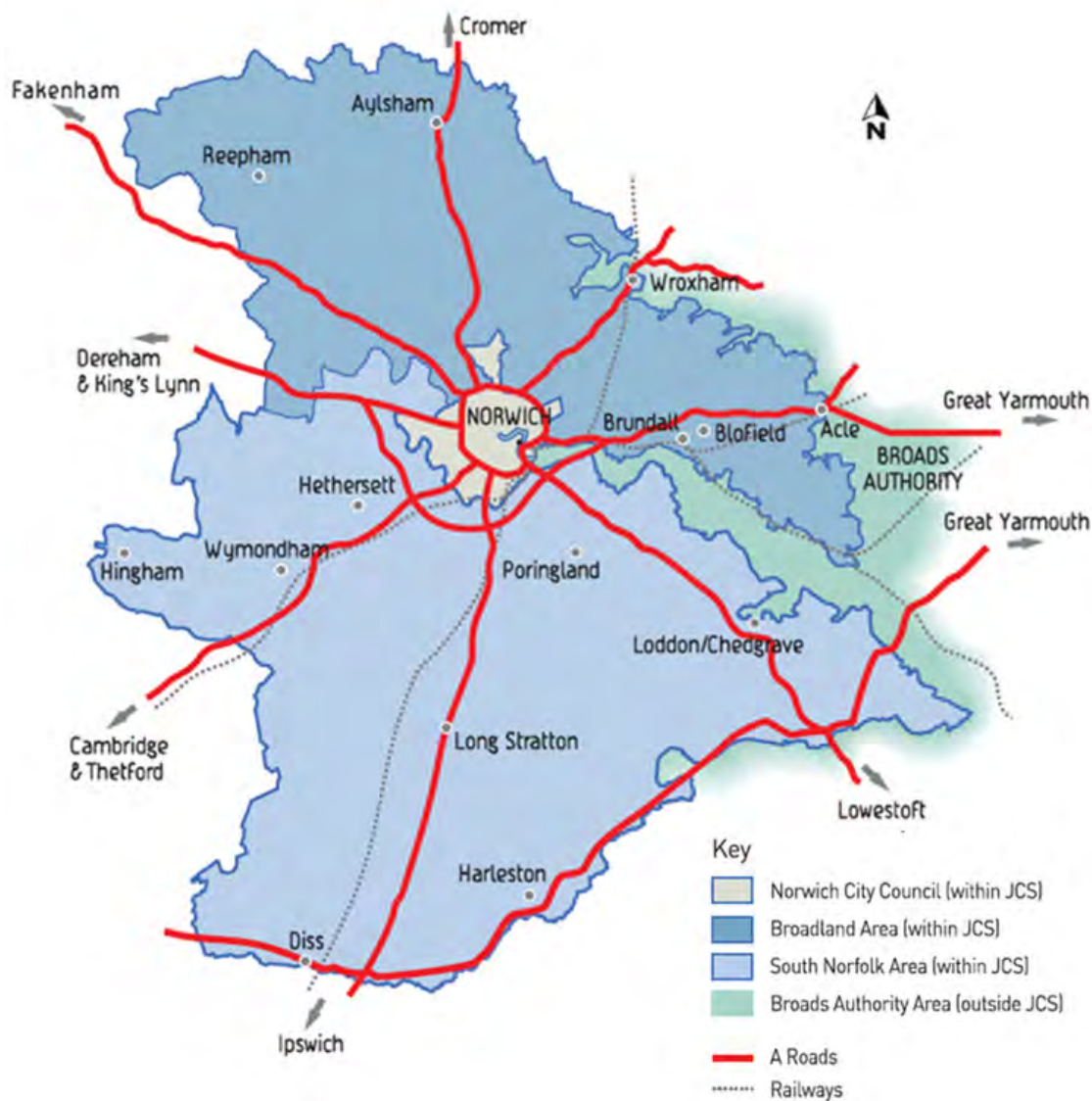


Source: Norwich City

Greater Norwich

- 2.12 **Greater Norwich**, shown in Figure 4 below, is a construct of the now defunct Regional Spatial Strategy for the East of England which identified the area as an engine of growth. The 2015 Norwich Economic Assessment notes that the three local authorities are now referred to collectively as the Norwich City Deal area and the Greater Norwich Growth Board area. The Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk is the key planning policy document for the Greater Norwich area and forms part of the Local Plans for the districts of Broadland, Norwich and South Norfolk.
- 2.13 Considering Norwich, Broadland and South Norfolk together has proven useful from a policy perspective in directing existing institutions to deliver coherent plans, such as the JCS, for Norwich and its hinterland. The three/four authorities have cooperated to facilitate growth which has enabled opportunities such as the Broadland Business Park, Norwich Research Park, and NDR to come forward.
- 2.14 However, the Greater Norwich area is large and alludes to a centralised perspective with a dependence on Norwich which may not necessarily be the case for peripheral towns and villages. The scale of the Greater Norwich area also dilutes analysis of the distinct band of valuable employment areas that form a ring around Norwich. As pinpointed above, there is a need to more clearly capture the influence of these peripheral sites, particular as they continue to compete with the Norwich city centre. As such, the Greater Norwich area is considered too large a reference geography and the NPA is instead preferred.

Figure 4: Joint Core Strategy Area



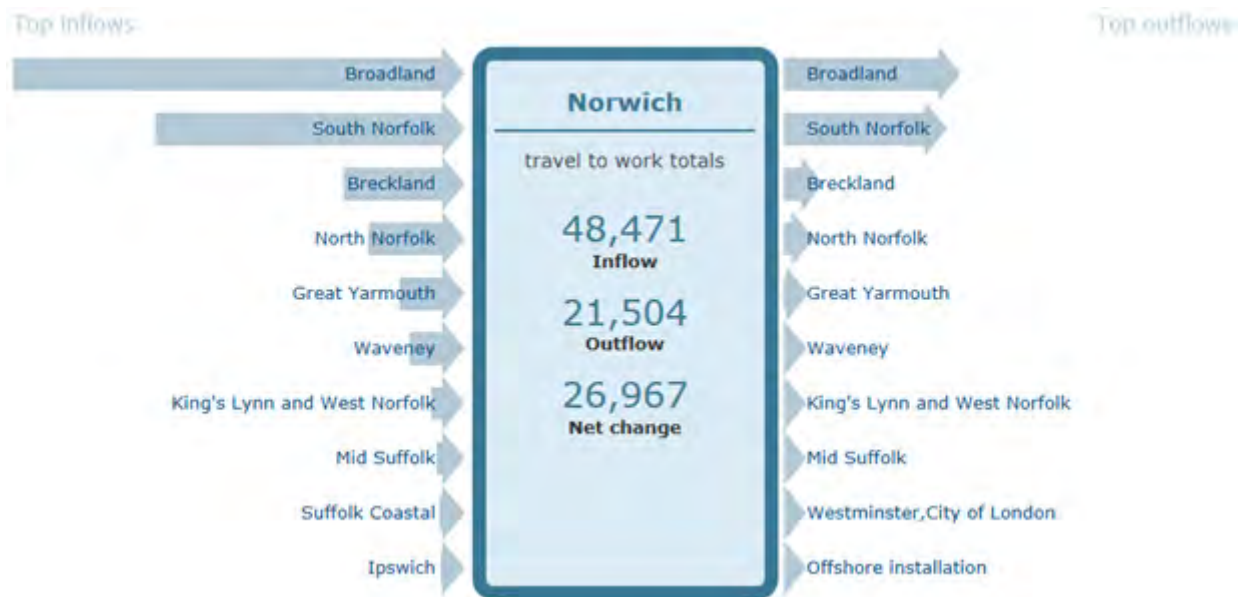
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Norwich Travel to Work Areas

2.15 **Travel to Work Areas (TTWAs)** are a statistical tool designed by the Office of National Statistics that provide a useful indication of the connectedness of locations based on labour movements. Figure 5 draws upon 2011 Census data and shows that the majority of those who travel in and out of Norwich for work live within Greater Norwich. Given that parts of the Norwich urban area fall within its neighbouring local authority boundaries, some of this cross boundary movement is in fact likely to be movement within the Norwich urban area.

2.16 Figure 5 shows that 125% (26,967) more individuals travel into Norwich for work than those who travel out. 41% (19,976) of people who travel into Norwich for work are from Broadland and 26% (13,361) from South Norfolk. Of the 21,504 people that commute out of Norwich for work, 36% (7,681) travel to Broadland and 33% (7,025) to South Norfolk.

Figure 5: Norwich Travel to Work Flows

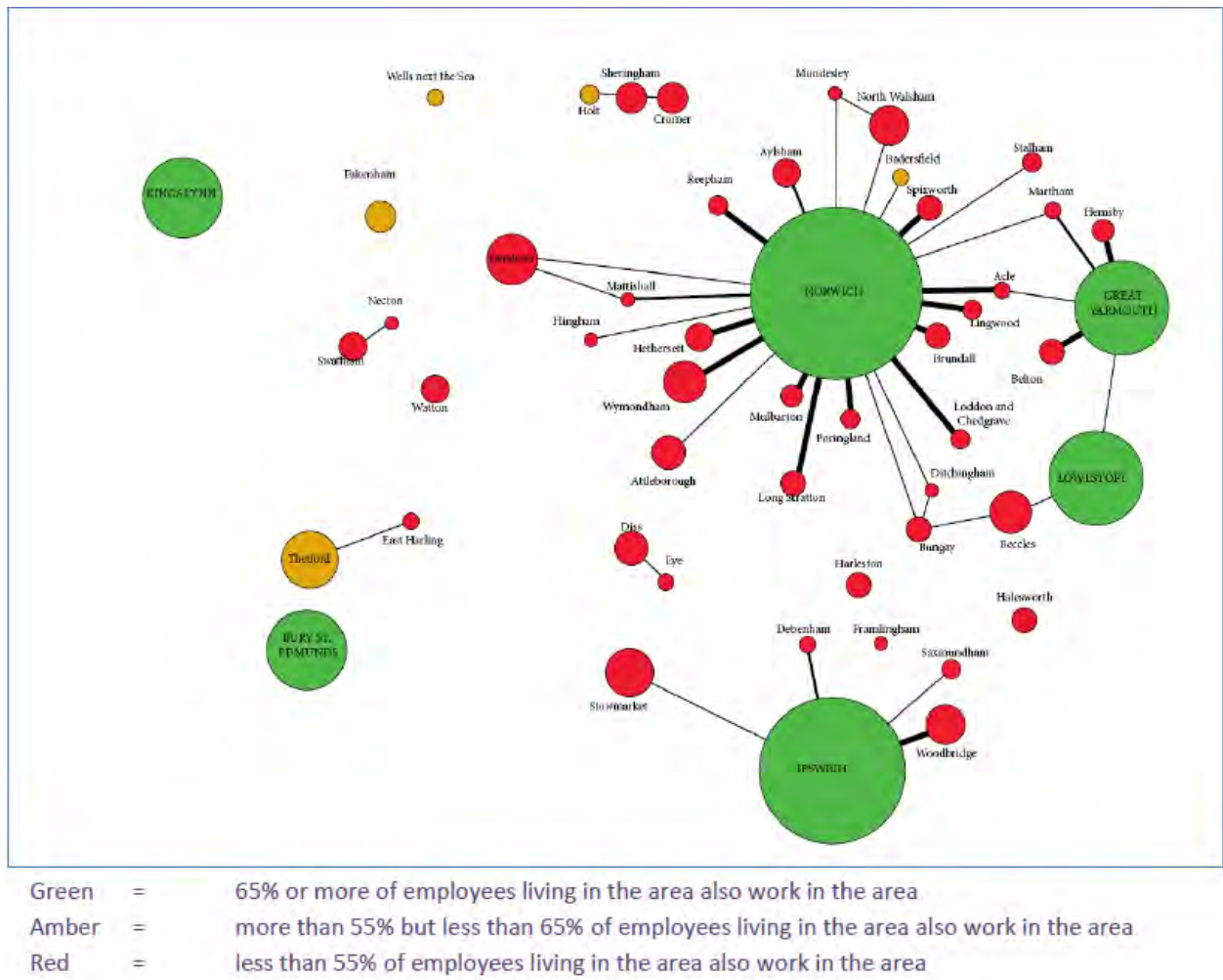


Source: Census, 2011

- 2.17 Figure 6 shows functional relationships based on 2001 origin-destination data (2011 data is currently safeguarded for small areas). Drawn from the 2016 Central Norfolk SHMA, the size of the urban centres (the coloured circle) is proportional to the number of workers who live within the area. The more workers, the larger the circle; hence Norwich is the largest circle.
- 2.18 The links that exist between the urban centres are also illustrated by the joining lines, with stronger links having heavier lines. The thickness of the line does not simply represent the number of workers, but it is based on a 'score' that is based on the strength of the connection when taking into account the number and the proportion of the resident and workplace populations in both areas.
- 2.19 The figure shows that Norwich has strong labour connections with 11 proximate settlements¹ and functions as part of a wide and partially interconnected network. Norwich is the prime employer in the Central Norfolk study area and provides jobs for an extensive catchment that includes settlements across Greater Norwich and outside it.

¹ Wymondham, Hethersett, Mulbarton, Long Stratton, Poringland, Loddon and Chedgrave, Brundell, Lingwood, Acle, Spixworth, and Reepham.

Figure 6: 2001 small area functional relationships



Source: Central Norfolk Strategic Housing Market Assessment, 2016

2.20 As shown in Figure 7, the Norwich TTWA includes the Norwich Local Authority and all of Broadland and South Norfolk local authorities plus parts of the local authority areas of North Norfolk, Breckland and Mid-Suffolk. The Norwich TTWA is much larger than the Norwich Policy Area (NPA) and reflects the increased range of commuting brought about by greater car ownership and higher employment mobility which has widened the functional economic area and the real functional reach of the city.

Figure 7: Norwich Travel to Work Area



Source: *Norwich Local Economic Assessment, 2015*

- 2.21 The 2015 Norwich Local Economic Assessment notes that the Norwich TTWA has 234,986 economically active residents and 220,540 residents in work, 191,408 of Norwich residents work in the 221,571 jobs that exist in the TTWA. Around 87 per cent of employed residents work within the TTWA and 86 per cent of jobs in the TTWA are held by TTWA residents.
- 2.22 Norwich's economic footprint, that is the degree to which firms and households are integrated into the local, regional and national economy in terms of their purchases and sales, is difficult to determine and even more difficult to quantify. Without doubt the urban area of Norwich acts as a regional service centre and a locus for services such as health, retail and leisure. It is a major employment centre, providing almost two-thirds of the TTWA's jobs. Much of the Norwich TTWA is rural with very low population densities; so although parts of the North Norfolk and Mid Suffolk local authority areas fall within the Norwich TTWA the actual numbers of people involved are very small.

Norwich Broad Rental Market Area and Housing Market Area

- 2.23 **The Broad Rental Market Area (BRMA)** is the geographical area used by the Valuation Office Agency (VOA) to determine the Local Housing Allowance rate (LHA), the allowance paid to Housing Benefit applicants living in the private rented sector. The BRMA area is based on an area where a person could reasonably be expected to live taking into account access to facilities and services for the purposes of health, education, recreation, personal banking and shopping. When determining BRMAs the Rent Officer takes account of the distance of travel, by public and private transport, to and from these facilities and services.
- 2.24 Figure 8 shows the BRMA area for Central Norfolk and Norwich which has a reasonable degree of fit with the Norwich TTWA. Aligned with the analysis of the TTWA, the BRMA indicates Norwich has an influence on residential location decisions that extends beyond the Greater Norwich area.

Figure 8: Central Norfolk and Norwich Broad Rental Market Area

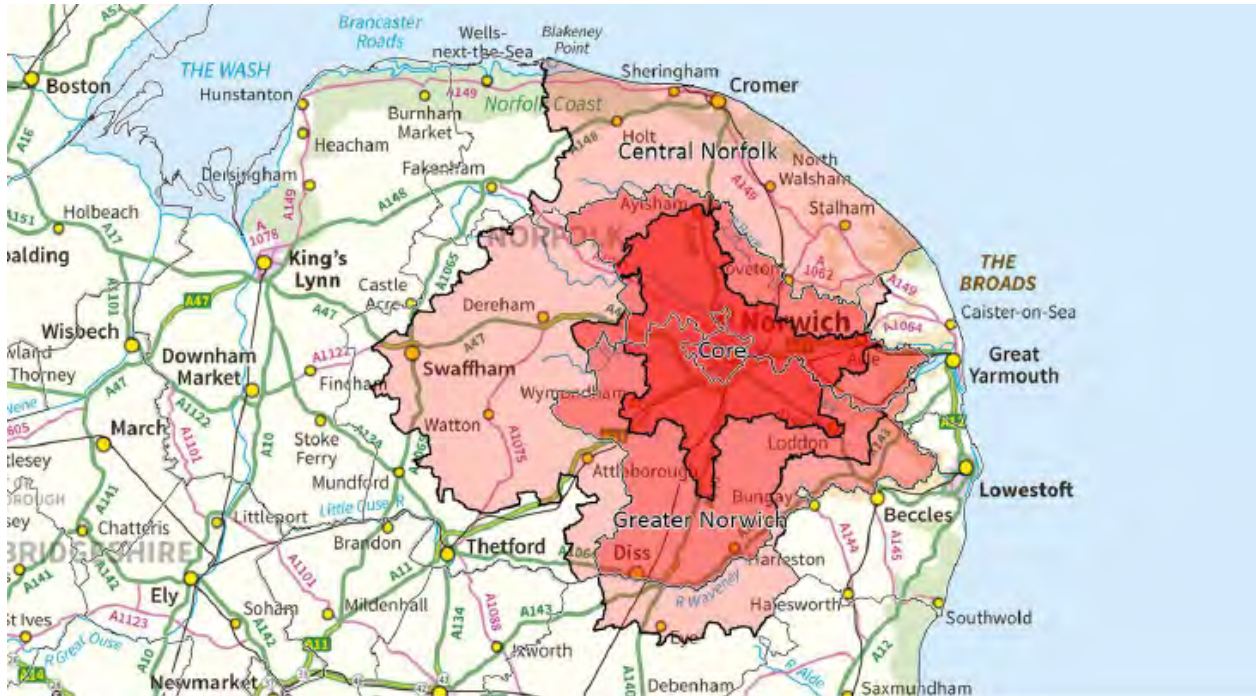


Source: Norwich Local Economic Assessment, 2015

- 2.25 Figure 9 shows the **Central Norfolk Housing Market Area (HMA)** identified by the 2015 Central Norfolk Strategic Housing Market Assessment. The wider catchment is reflective of the scale of the BRMA and TTWA, reinforcing the observation that Norwich has a large geographic influence and acts as a prominent economic centre in East Anglia.
- 2.26 The Core area shows the settlements with the strongest connections to the Norwich Urban Area which is similar to the Norwich Policy Area. This suggests that a large proportion of housing should be delivered in these locations that are peripheral to the Norwich local authority area. This is

illustrative of the cohesion within the NPA, noting that the HMA core does not simply align to the local authority boundary or continuous urban area.

Figure 9: Housing Market Area in and around Greater Norwich (Source: UK Census of Population 2001 combined with DEFRA Classifications)



Source: Central Norfolk Strategic Housing Market Assessment, 2016

Section Summary/Findings

- 2.27 **Close alignment of Norwich Policy Area with Norwich Urban Geography:** Each of these geographies illustrates the extent of influence that Norwich has over its sub-regional hinterland and the complexity of its catchments for jobs, labour and homes. The figures above show that Norwich's catchment for those working in the city and depending on its services is larger than the Norwich City Authority area.
- 2.28 The study continues below by reviewing the infrastructure and site assets, referred to as 'growth drivers' that form the nodes and spokes around which much of the development and growth driven by Norwich is located. Acknowledging that the local authority area poorly captures extensive growth opportunities positioned on outside the city authority boundary but within the continuous urban area and that overly large Greater Norwich area renders analysis obtuse and unrefined, the Norwich Policy Area is considered the best reference geography for the following sections of this report.
- 2.29 The NPA is a useful reference geography because, as shown in this section, the majority of assets that are of strategic importance are located within this area. The NPA therefore closely aligns with the Norwich functional economic area. Further, as analysis of functional relationships with

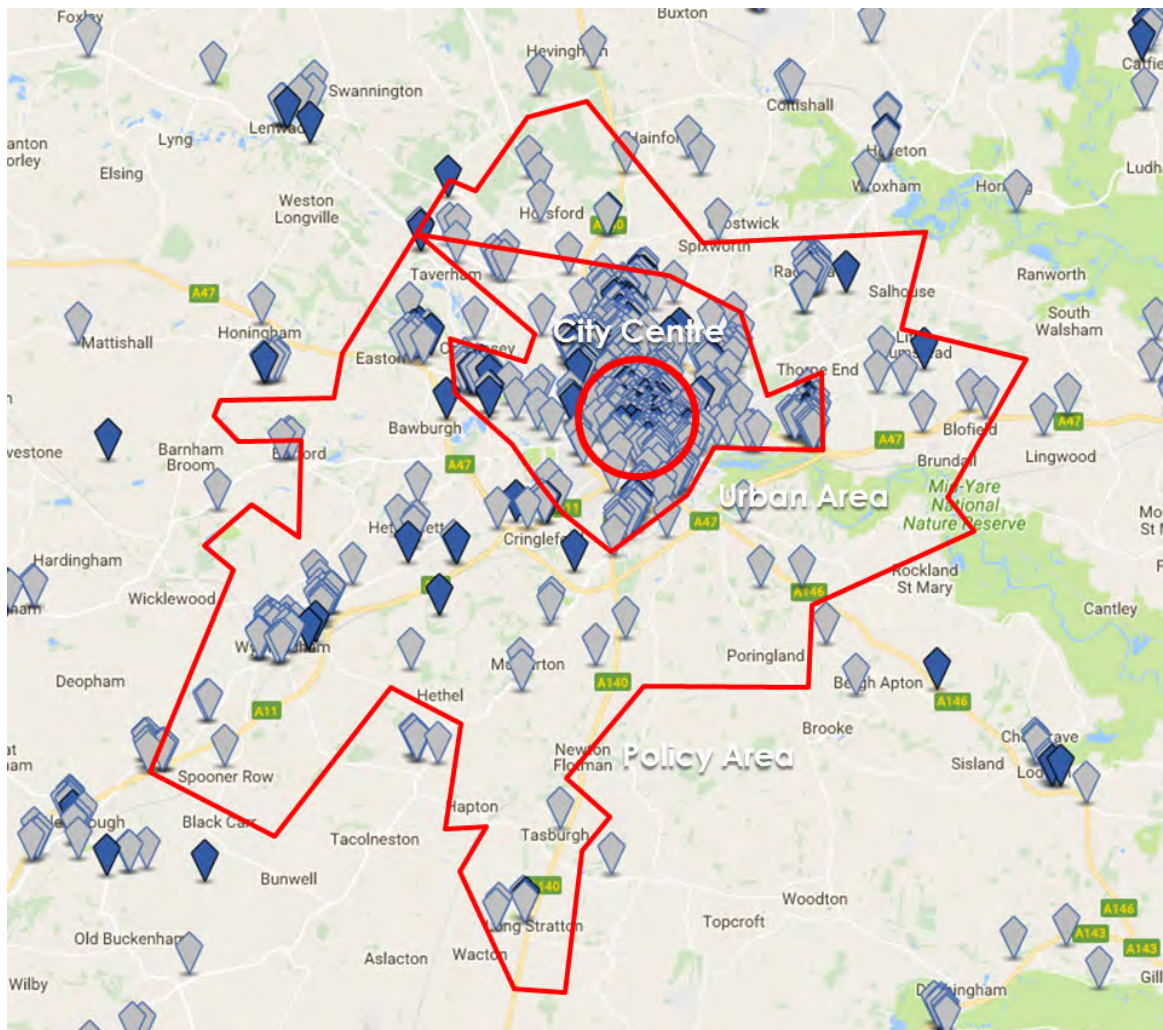
neighbouring centres and HMA shows, Norwich is most strongly connected to settlements and development sites within this area. Unlike the local authority and Greater Norwich areas, the NPA is therefore shown to be of an agreeable size that enables detailed and commensurate analysis. Moreover, the NPA is an existing designation that is recognised and supported by each of the local authorities within Greater Norwich and its continued use enables reference to an established evidence base.

3. Market Review

Commercial Market

- 3.1 This section provides a review of the property geographies within the NPA reference geography as designated within the previous section. To undertake the analysis we have compared NPA with the city centre and “urban area” as shown in Figure 10. It reviews total quantum, vacancy levels, rents, and net absorption as a measure of market activity. An extensive baseline analysis is available for the Norwich local authority area and neighbouring local authorities as part of the Greater Norwich Employment, Town Centres and Retail Study.
- 3.2 Figure 10 shows that the majority of commercial buildings are concentrated in the Norwich urban area with heightened concentration in the city centre. Outside of the urban area, commercial buildings are primarily located in key business and industrial sites which are reviewed in the following growth drivers section.

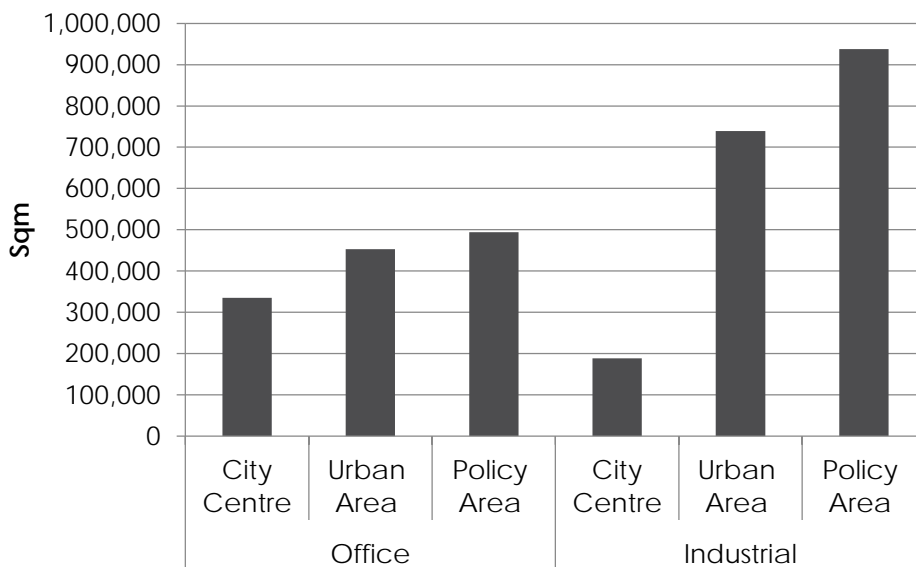
Figure 10: Commercial Properties within Norwich Policy Area



Source: Costar, 2017

3.3 **Quantum of commercial floorspace:** Figure 11 reviews office and industrial stock by floorspace across the three different geographies. It shows that the majority of the office space in the wider Norwich Policy Area (494,051 sqm) is located in the urban area of Norwich (453,284 sqm) and more specifically in the city centre (334,875 sqm). Industrial floorspace is more dispersed throughout the Norwich Policy Area (937,698 sqm), with a large proportion located in the urban area (738,823 sqm) but in more peripheral locations such as in industrial estates rather than in the city centre (188,766 sqm).

Figure 11: Existing Floorspace



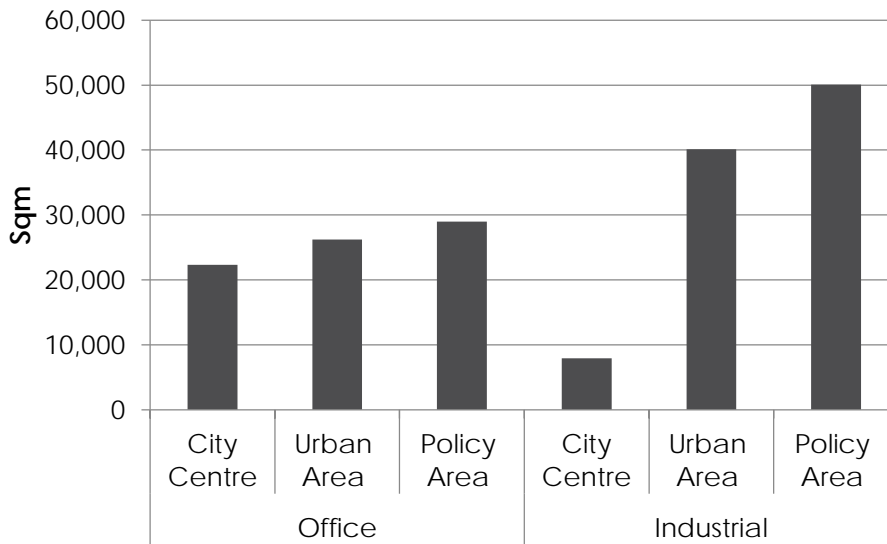
Source: Costar, 2017

3.4 **Vacancy Rates:** Vacant floorspace shown below in Figure 12 are reflective of the existing floorspace in their proportions. Office vacancy rates are slightly higher than industrial vacancy rates and whereas city centre industrial vacancy rates are relatively low, city centre office vacancy rates are relatively high. There are a number of factors that are driving this relationship. Firstly it there is a much lower supply of industrial floorspace meaning there is less choice for businesses seeking to service the city and therefore occupancy rates would be expected to be higher.

3.5 More importantly, like many locations that have had a historically large office based economy, the city centre has seen a large proportion of its stock rendered redundant as buildings have aged, refurbishments considered unviable and newer stock delivered outside of the city centre. Coupled with changes to occupier requirements and preferences for stock much of the older provision has now become redundant and therefore lies vacant. This provides a drag on the city centre market, with high vacancy rates (of units that are unlikely to be re-used) deflating rental values.

3.6 In limited cases, such as the Union Building on Rose Lane, this stock has been repurposed to provide a mix of commercial space, including some office/co-working alongside food and beverage and other services to create a different environment for businesses.

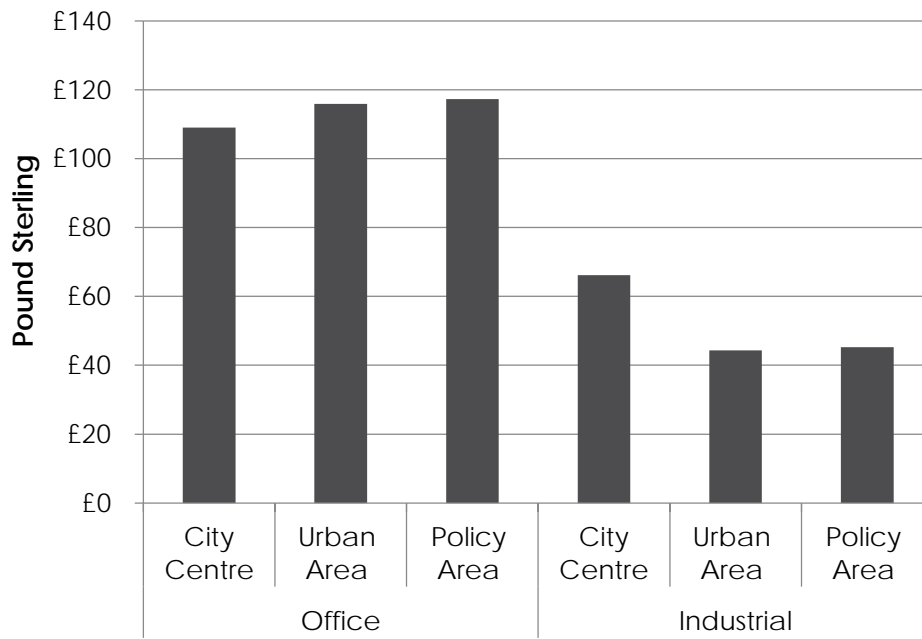
Figure 12: Vacant Floorspace



Source: Costar, 2017

3.7 **Rents:** As is typical, office rents per sqm are higher than industrial rents. Average office rents are higher in peripheral locations rather than in the city centre, this reflects the stock condition issues discussed above and the increased demand this has led to in out of centre locations, in a more 'healthy' market rents in the centre would typically be higher. Industrial rents are however higher in the city centre and this is reflective of most urban areas, given the lack of available industrial units in centres and sites to accommodate such uses.

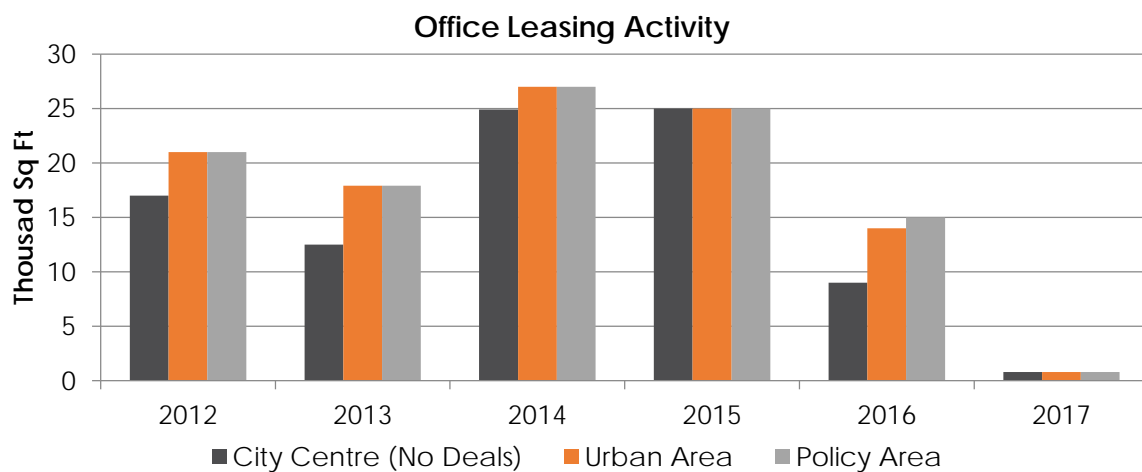
Figure 13: Rents per sqm



Source: Costar, 2017

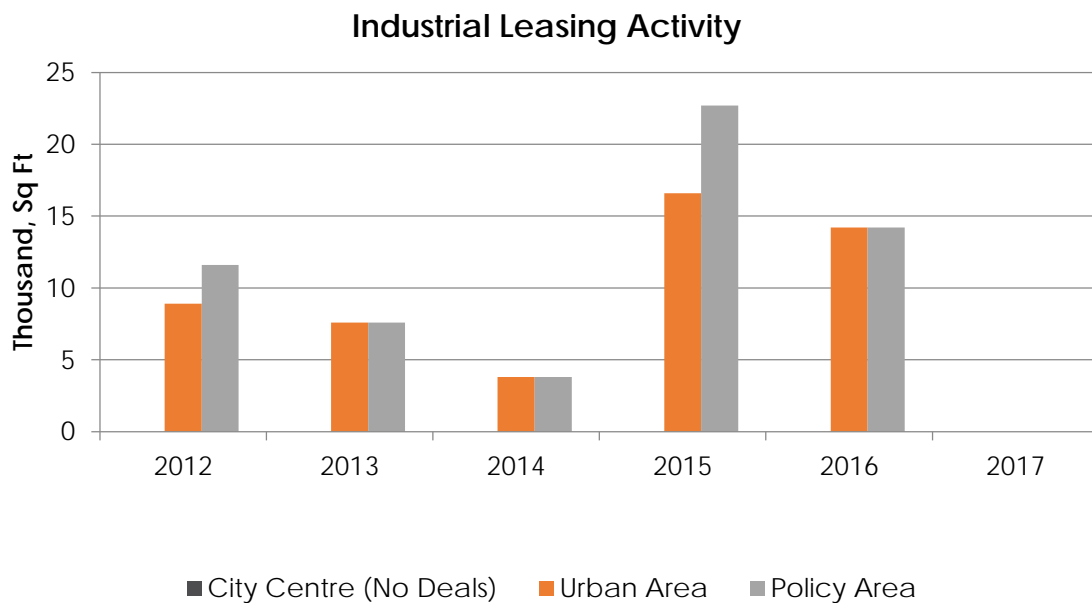
3.8 **Leasing Activity:** Figure 14 and Figure 15 shows leasing activity trends in Norwich for both office and industrial market. Leasing within the office market has fluctuated in recent years with a significant fall in 2016 across the three geographies. This fall may not necessarily be representation of a wider trend but illustrates that activity within the geographies is primarily driven by external factors rather than simply movements across NPA sites. Leasing activity for industrial floorspace seems to have improved in recent years and is reflective of the wider UK trend of increasing industrial floorspace take-up

Figure 14: Office Leasing Trends by Year



Source: Costar, 2017

Figure 15: Industrial leasing Activity by Year



Source: Costar, 2017

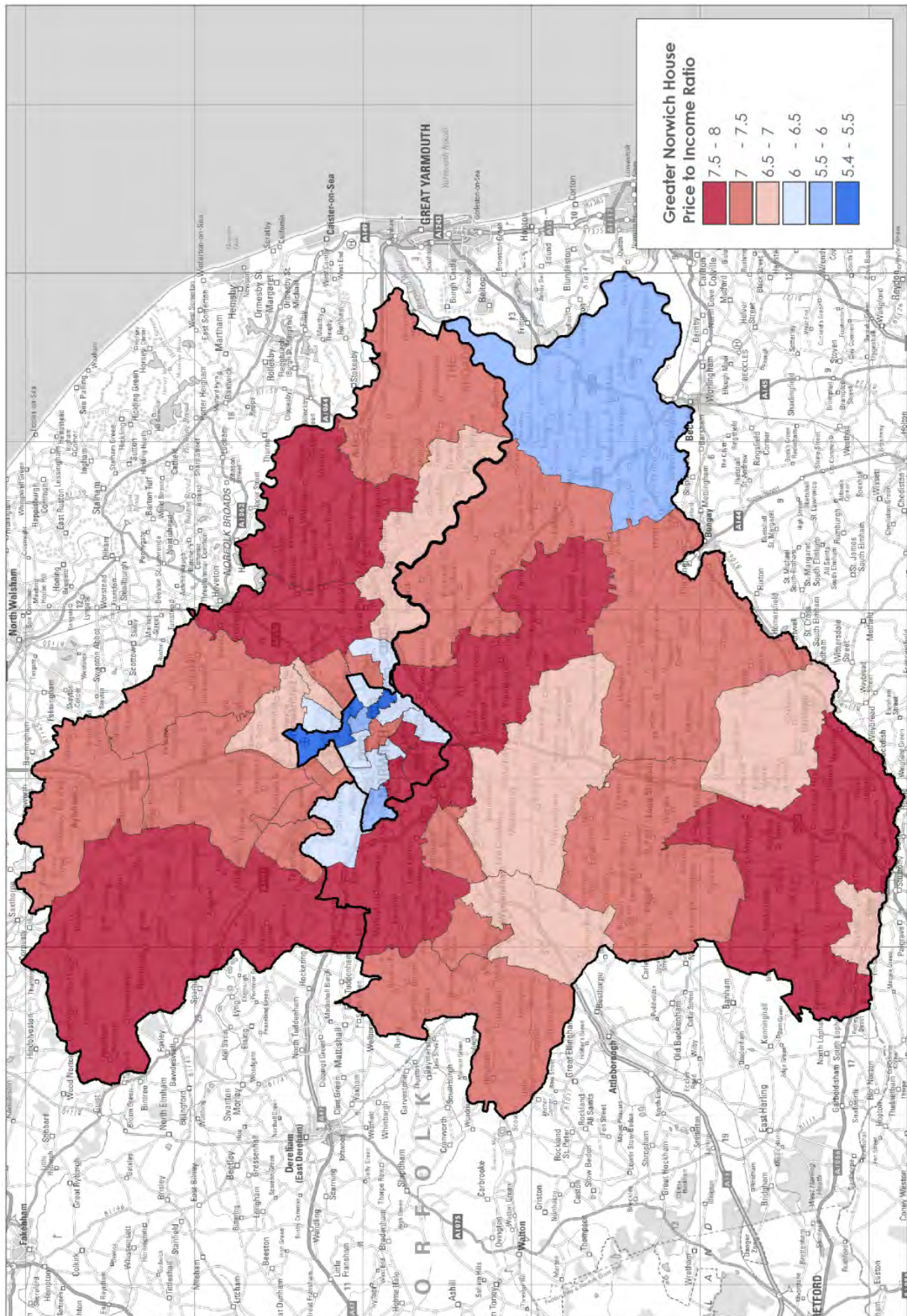
- 3.9 Overall the property analysis above suggests a lower demand for office space than industrial space across the NPA which is particularly acute in the city centre. Although a long term trend is difficult to pinpoint, there does appear to be some reduced activity in the office market. Examples such as the relocation of some of Aviva's activity from the core to the Broadland Business Park as well as potential negative impacts surrounding outcomes of the current political climate (such as Brexit) does suggest a need to capture changing needs of office and industrial typologies in line with location, occupier needs and sectoral focus.

Housing Market

- 3.10 Alongside the geographies of commercial property floorspace and cost, house price affordability is also of interest because it reflects how well a local economy is doing, how desirable an area is, whether there may be affordability issues for attracting talent, and is comparable across the country. In Lloyds Bank's 2017 housing affordability report², Norwich's housing market was ranked the 15th most expensive in the country. Norwich is therefore considered a desirable place to live and work, which is also reflected in its large HMA catchment as discussed above.
- 3.11 Figure 15 below shows housing affordability in postcode areas across Greater Norwich. It shows that the most affordable locations are primarily located in the Norwich urban area, the highest value postcodes in Norwich are those to the south west. These value dynamics are driven by a complex range of inter-related factors including stock typology and age, mix of housing tenures, amenities and transport provision, quality of environment etc.

² <http://www.lloydsbankinggroup.com/globalassets/documents/media/press-releases/lloyds-bank/2017/250217-affordable-cities.pdf>

Figure 16: Greater Norwich House Price to Income Ratio by Postcode Area



Source: GVA, ONS, 2017

4. Growth Drivers

4.1 Growth drivers refer to the physical assets, principally infrastructure and growth locations, on and around which much of the development driven by the Norwich economy is likely to be positioned. This view recognises that local economic areas typically comprise a cluster of nodes (growth locations) and spokes (infrastructure) that are, in this case, centred around Norwich.

4.2 The value of these physical assets as growth drivers and how they come together to shape the Norwich economy is discussed below. Growth locations and key infrastructure are reviewed individually and then discussed together regarding their influence. Growth locations are discussed first as hubs of commercial and economic activity and key infrastructure is discussed second in how they facilitate connectivity between these nodes. Growth locations and key infrastructure reviewed below include:

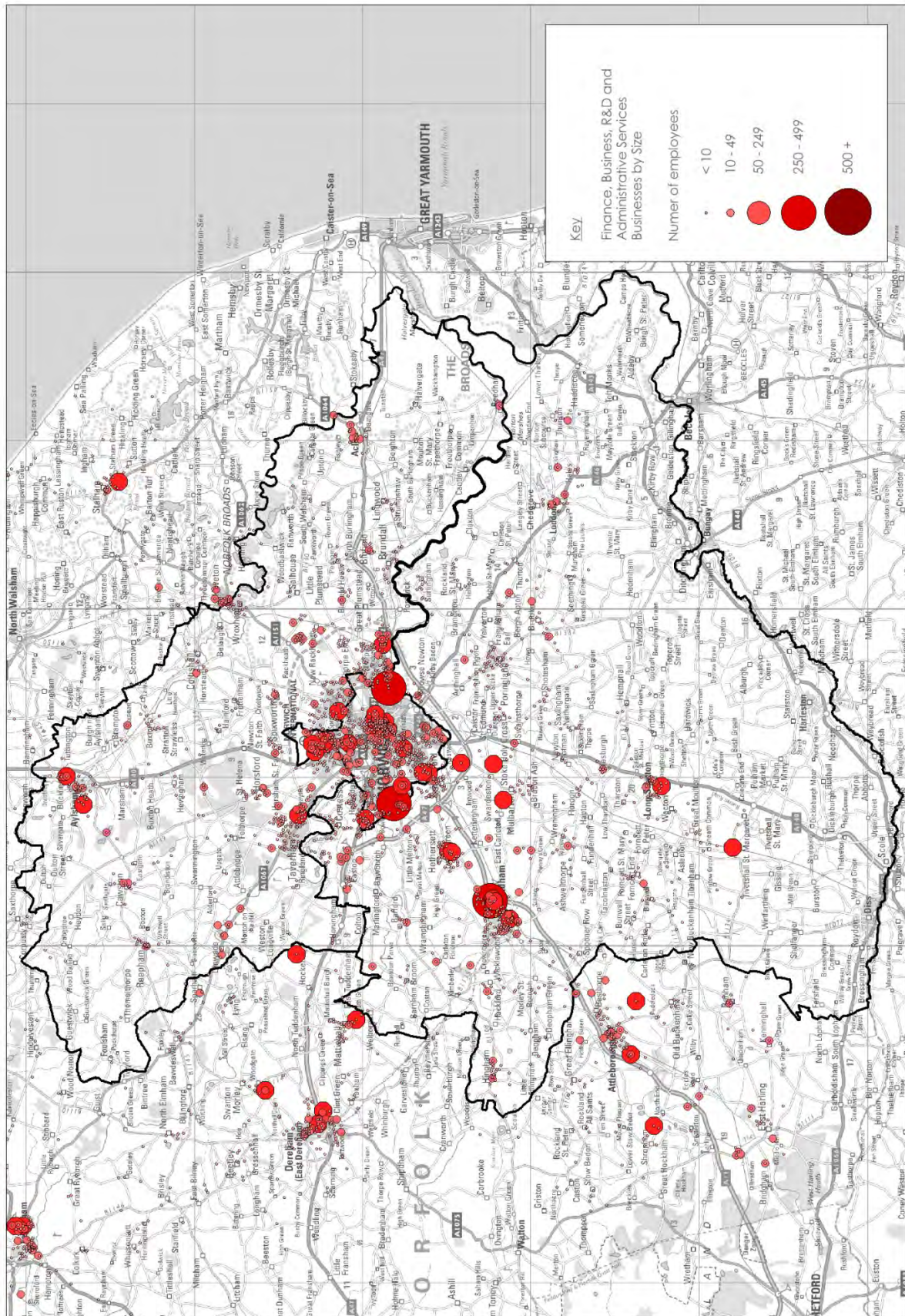
- Growth Locations
 - Norwich Research Park/ Cringleford
 - Broadland Business Park
 - Old Catton Sprowston, Rackheath, St Andrew Growth Triangle
 - Longwater/ Easton/ Cotessey
 - Wymondham and Hethel
 - Hethersett
 - Long Stratton
 - Norwich Airport
 - Norwich Urban Area
- Key Infrastructure
 - Northern Distributor Road
 - A11 Corridor (Tech corridor)
 - Long Stratton Bypass
 - Sustainable Transport Corridors/Green Infrastructure
 - Norwich International Airport
 - Rail Improvements

4.3 In addition to the above two sub-sections, the Norwich city centre is discussed separately and in more detail because of its role as the primary hub in the economy and because of the unique circumstance of loss of occupiers to other hubs in the NPA.

Growth Locations

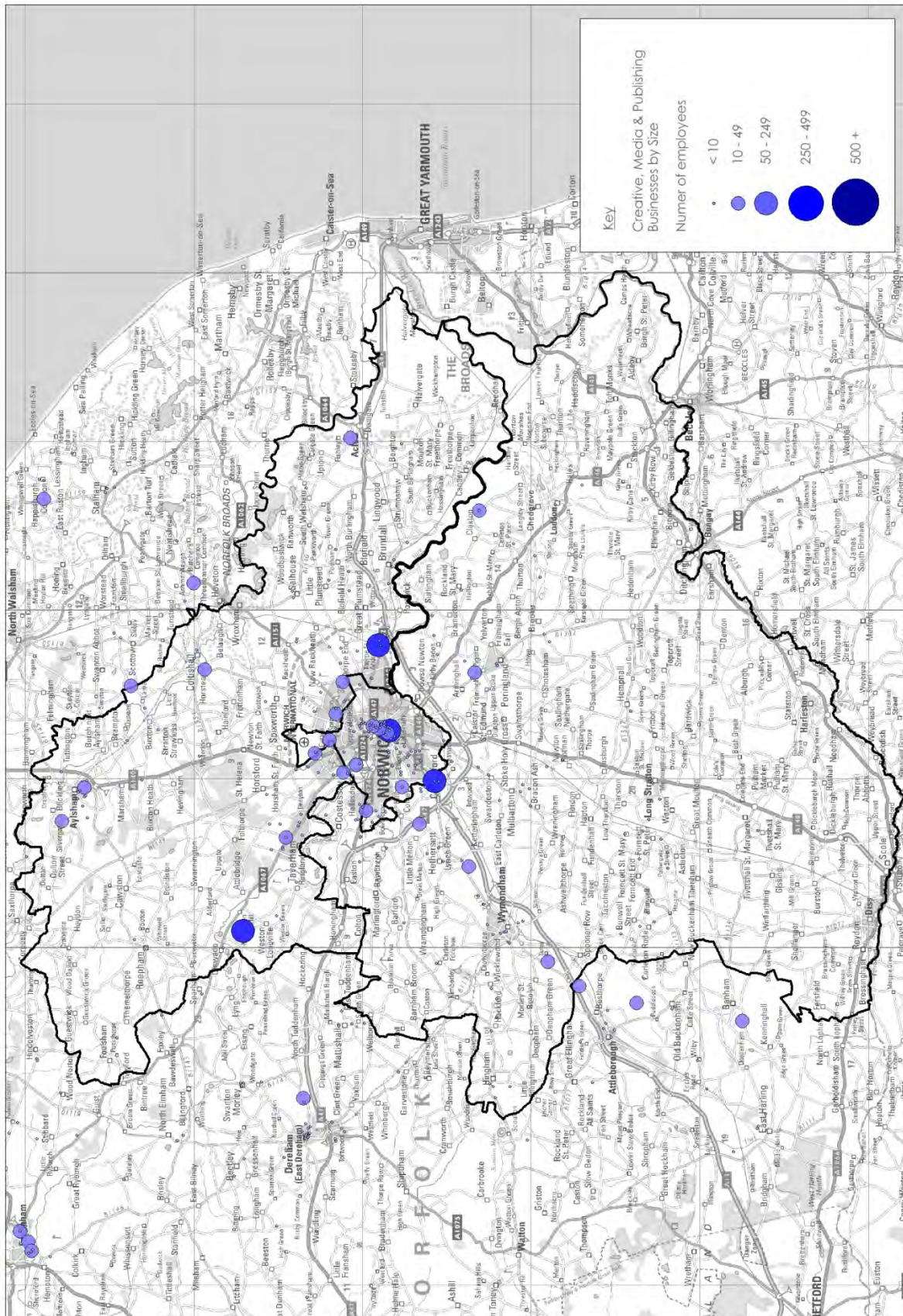
- 4.4 Growth locations are the hubs or nodes within a cluster, which forms a local economic area, where the majority of economic and commercial activity takes place. These centres typically attract the co-location of businesses, jobs and homes and therefore form the principal economic drivers of the geography in which the cluster/local economic area is located.
- 4.5 Figure 16, Figure 17 and Figure 18 show the geographies of business that specialise in finance and business services, the creative sector, media and publishing, and production and manufacturing respectively. The maps show that the majority of high value businesses cluster in the city centre and eight growth locations that are identified in Figure 19. The geographies of these businesses provide further support to the use of the NPA as the reference geography for this study because the majority, particularly those which are large, fall within this area.
- 4.6 The characteristics of these growth locations are tabulated below in Table 1. The table draws out key figures for these hubs, with reference to both commercial and residential potential, and which sectors they cater to. The table also makes reference to key infrastructure that is supporting continued growth. These centres are considered to be the points around which the NPA and the Norwich economy are plotted.

Figure 17: Business unit count based on number of employees: Finance, Business, R&D and Administrative Services



Source: EGi, 2017

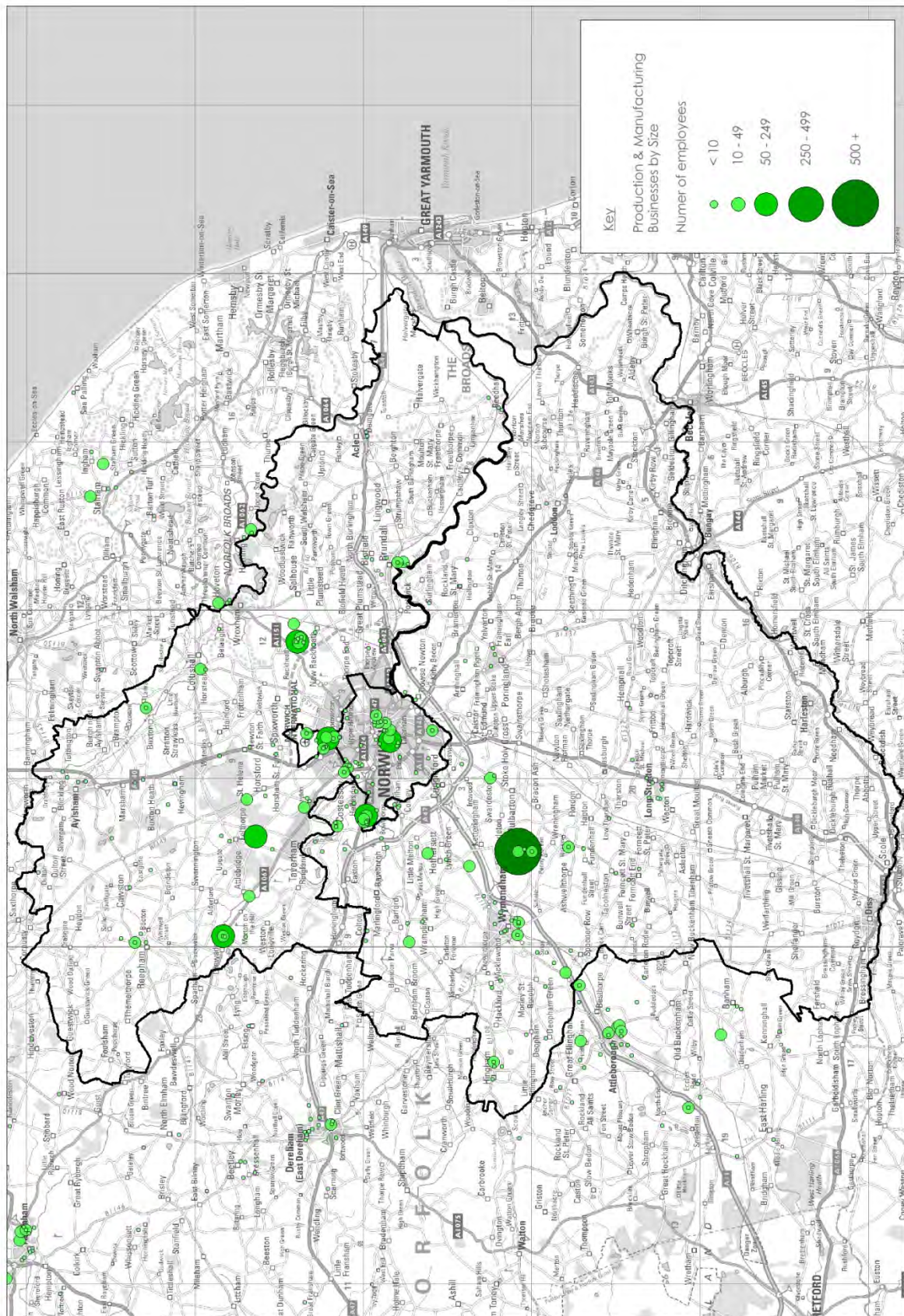
Figure 18: Business unit count based on number of employees: Creative, Media and Publishing Businesses



Map reproduced from GfP (2015 edition), MapData © Collins Bartholomew Ltd (2015), Data sourced from Office for National Statistics © Crown copyright 2016

Source: GVA, EGi, 2017

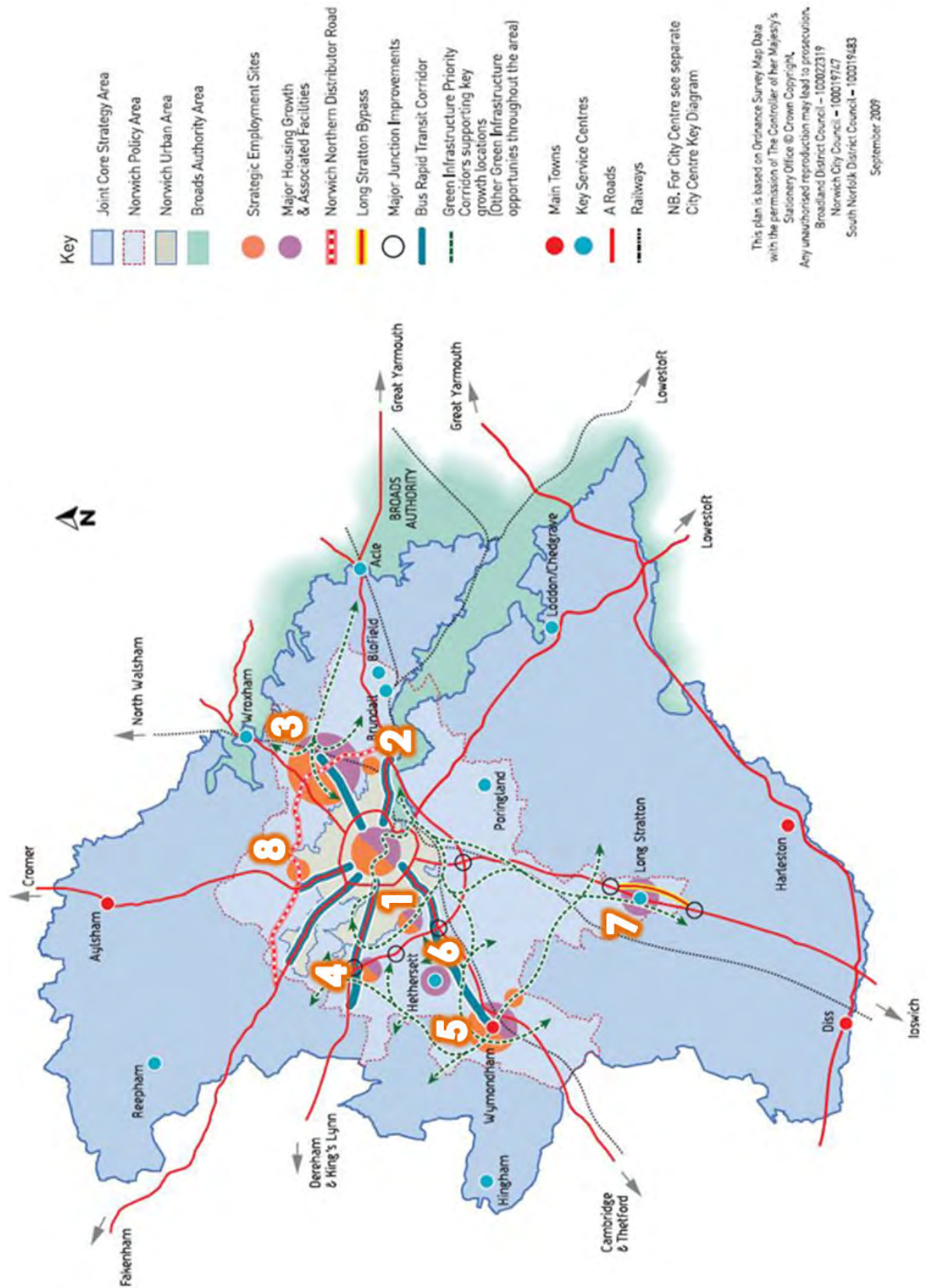
Figure 19: Business unit count based on number of employees: Production and Manufacturing Businesses



Map reproduced from GBPro 200 GB (2015 edition). MapData © Cairns Barrisomew Ltd (2015). Data sourced from Office for National Statistics © Crown copyright 2014.

Source: GVA, EGi, 2017

Figure 20: Existing Major Growth Locations



Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Table 1: Growth Locations, influencing infrastructure/ growth corridors and priority growth sectors

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
1	Norwich Research Park/ Cringleford	<ul style="list-style-type: none"> Renowned Science Park and centre for employment where nationally and internationally significant research is undertaken. The site is set over 230 ha and includes a community of over 75 businesses and 3,000 scientists with strengths in food, diet and health. Home to the John Innes Centre, University of East Anglia, Genome Analysis Centre, Institute of Food Research, Sainsbury Laboratory and the Norfolk and Norwich University Hospital (N&N). Importance of sector strengths to the UK economy likely to drive expansion alongside further co-location of similar businesses, spin offs and residential development. Expansion likely to be set over 55 ha with 1,200 dwellings planned. Expected cost of associated road works: £13,000,000. 	A11(Tech Corridor) and A47	Life Sciences and KIBs
2	Broadland Business Park	<ul style="list-style-type: none"> Large business park located on the eastern fringe of the Norwich urban area which includes a collection of grade A offices and industrial units. The park is home to many of the largest companies in the region, including Aviva, Lovewell Blake, and RBS. The business park is one of the best connected in the NPA with direct access to the A47 	Access to A47 and Northern Distributor Road	KIBs, Financial Services, Food & Drink, and Advanced Manufacturing

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		<p>and soon to be completed NDR.</p> <ul style="list-style-type: none"> As a relatively new development location, further space is available on existing sites and additional sites are allocated to enable continued expansion of the location. The site will continue to present some of best opportunities for businesses that require large and high quality space in proximity to urban amenities and a high skill labour pool. 		
3	Old Catton Sprowston, Rackheath, St Andrew Growth Triangle	<ul style="list-style-type: none"> Rackheath Industrial Estate is an established site located to the northeast of Norwich with a range of industrial occupiers. The site is set to benefit from the completion of the NDR that will lie in proximity and greatly increase connectivity. The site is also set to form part of the North Rackheath masterplan and wider growth triangle which is planned to deliver a large amount of residential and commercial floorspace. The Growth Triangle is expected to have capacity for over 13,000 homes and 25 ha of employment land. Expected cost of the Growth Triangle internal link road: £14,350,000. 	Northern Distributor Road	Advanced Manufacturing and Food & Drink
4	Longwater/ Easton/	<ul style="list-style-type: none"> Longwater is an industrial area located to the west of Norwich with direct access to 	Access to A47 and completion	Food & Drink

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
	Costessey	<p>the A47.</p> <ul style="list-style-type: none"> The area has historically had a large amount of open storage use that is now seeing change towards big box retail and industrial units. Access to the A47 has enabled occupiers such as Pasta Foods to locate on site and proximity to Norwich researchpark and the Bowthorpe Employment Area suggest potential for opportunities for potential occupiers in the food production and technology sector. The site is also set to benefit from the completion of the NDR that will lie in proximity and further improve connectivity. 	of Northern Distributor Road	
5	Wymondham and Hethel	<ul style="list-style-type: none"> Wymondham is a town located to the south west of Norwich following the A11. Hethel is a rural location that lies in proximity to Wymondham. The area has recently seen substantial development across its industrial sites which cater to a range of sectors in typically sizeable units. Hethel is the home to Group Lotus, which is located rurally to accommodate a test track, and the high value Knowles Engineering Centre. Regarding development, 2,200 homes are planning for Wymondham and, on land between the Group Lotus and Knowles Engineering Centre sites, a 20ha 	A11 (Tech Corridor)	Advanced Manufacturing and KIBs

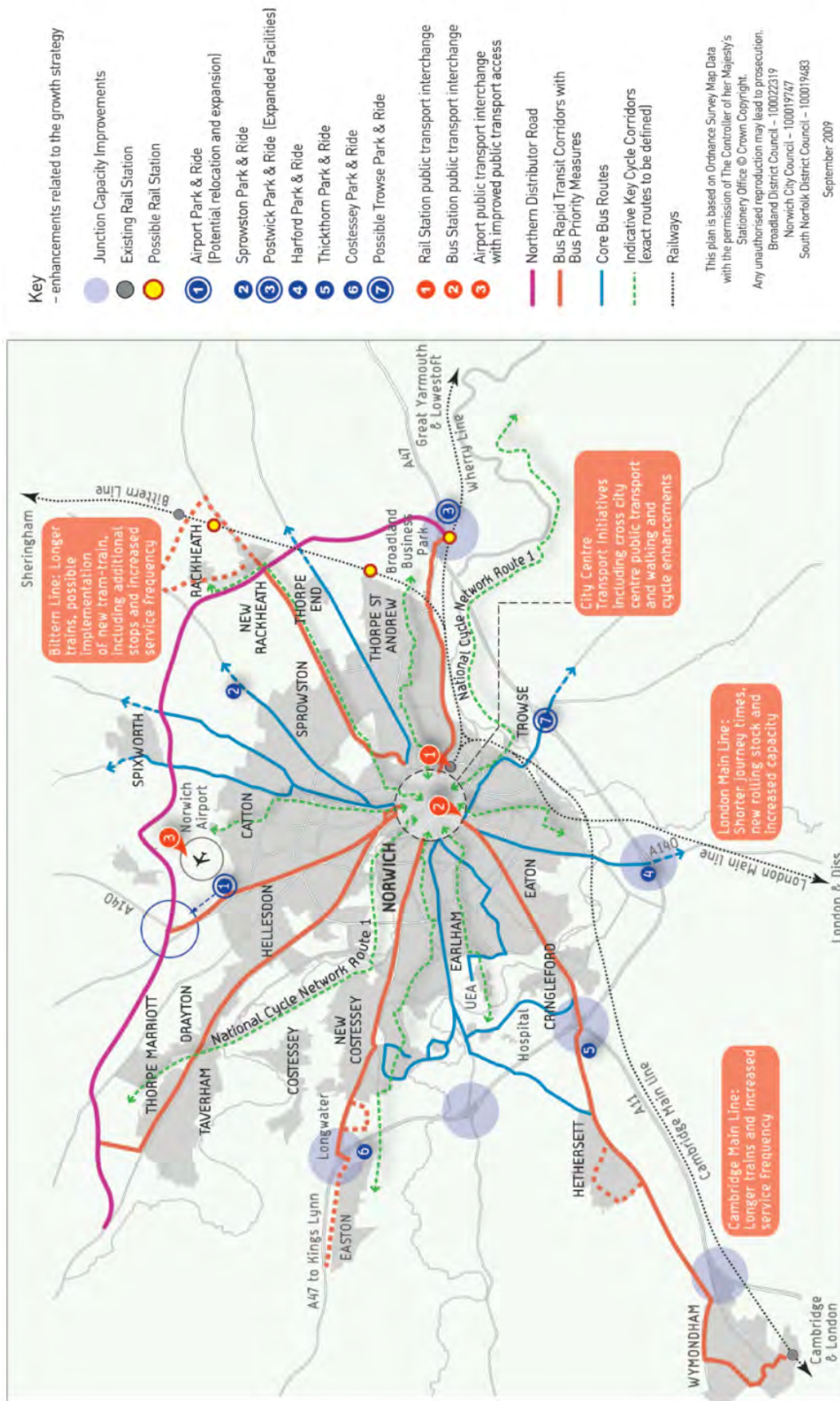
Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		Technology Park is planned for Hethel.		
6	Hethersett	<ul style="list-style-type: none"> Hethersett is a large village located to the south west of Norwich following the A11. The Hethersett North masterplan is expected to create a large contribution to meeting the Central Norfolk housing need with 1,196 homes planned for the area. The development is likely to make a large contribution to the talent pool, providing high quality homes to attract skilled workers. 	A11 (Tech Corridor) and A47	
7	Long Stratton	<ul style="list-style-type: none"> Long Stratton is a civil parish to the south of Norwich following the A140. The Long Stratton Area Action Plan was adopted in 2016 and anticipates that a minimum of 1,800 new homes and 12 ha of employment land. Development is likely to create a shift change for the area, which will be supported by the delivery of the Long Stratton bypass, creating a new centre in the NPA. 	A140, Long Stratton Bypass	
8	Norwich Airport	<ul style="list-style-type: none"> Norwich Airport is located towards the north of Norwich and has a large site with associated industrial use on its boundary. The NDR, when completed, will pass to the north of the airport and is set to create a series of development opportunities on airport land and to the north of it. Following the completion of 	Northern Distributor Road	Advanced Manufacturing; ICT

Ref No	Growth Location	Description	Infrastructure Influence	Priority Growth Sectors
		the NDR, further phases of the Aeropark development are also expected to continue, which previously promised 1,000 jobs set over a 100 acre site to secure the future of the airport.		

Key Infrastructure

- 4.7 Infrastructure acts as the spokes between nodes that facilitates accessibility and connectivity to create the wider cluster system that underpins a local economic area. In this sense, an effective transport network is critical to fostering sustained economic growth within a local economy. These connections enable businesses to reach their customers, connect with suppliers and draw from a wide pool of labour that is either located in other hubs/nodes within the area or further afield. These connections have led to Norwich becoming an economic centre in East Anglia, with strong multi-transport connections between NPA centres and to other regional economies such as London and Cambridge.
- 4.8 This section considers both existing and yet to be completed infrastructure, discussing the value of existing transport links and the growth that is likely to come forward with further connectivity. Figure 19 above and Figure 20 below show the existing and proposed infrastructure schemes that encourage growth in the NPA. Much of the proposed infrastructure provides improved links and accessibility to existing growth locations, but also provides new development opportunities on sites that were previously poorly connected. The characteristics of key infrastructure are tabulated in Table 2 which includes descriptions and the particular growth locations that these transport links support.

Figure 21: Norwich Area Transportation Strategy – proposed implementation plan



Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Table 2: Key Infrastructure and growth Locations

Key Infrastructure	Description	Growth Locations Principally Supported
Northern Distributor Road	<ul style="list-style-type: none"> • The Northern Distributor is a 20km dual carriageway road under construction to run from the A47 at Postwick, east of Norwich, to the A1067 Fakenham Road north of Taverham. • As alluded to above, the NDR will improve accessibility to a series of growth locations alongside improving connection to the A47 and routes that lead north out of Norwich. • The route is also set to reduce cross-city congestion and in doing so will support the Norwich infrastructure stately to encourage more sustainable transport in the city. • Overall, the NDR is expected to deliver £1bn of economic benefits to Norfolk and support the creation of new businesses and jobs. • The £96.5 million committed by the Department for Transport (DfT) for the Northern Distributor Road (NDR) is ones of the largest single transport investments in the East of England since the 2008 financial crash. • A further £40 million is drawn from the Community Infrastructure Levy, the Norfolk County Council, the New Anglia LEP, and Growth Points Fund. • The overall expected cost is £178,950,000. 	<ul style="list-style-type: none"> • Longwater/ Easton/ Cotessey • Norwich Airport • Old Catton Sprowston, Rackheath, St Andrew Growth Triangle • Broadland Business Park
A11 Corridor (Tech Corridor)	<ul style="list-style-type: none"> • The A11 links Norwich to Cambridge and leads to the M11 motorway for London. • The A11 provides access to several growth locations that are likely to see some of the strongest 	<ul style="list-style-type: none"> • Norwich Research Park/ Cringleford • Hethersett • Wymondham and Hethel

Key Infrastructure	Description	Growth Locations Principally Supported
	<p>growth, particularly regarding the delivery of homes, in the NPA.</p> <ul style="list-style-type: none"> • Following the dualling of the 64 mile route between Norwich and Cambridge, the road is now considered a tech corridor. • Activity on the tech corridor is expected to create £558m for the economy and the NPA will capture a sizeable amount of this in its growth locations and from Cambridge overflow. 	
<p>A47 Corridor/ Bypass</p>	<ul style="list-style-type: none"> • The A47 bypasses Norwich to the south from Longwater in the west to Postwick in the east. • The A47 is the main east west connection in northern East Anglia which connects Norwich with Great Yarmouth to the east and to Kings Lynn to the west, which ultimately connects to Peterborough. • The A47 is a key transport route for Norwich and improves the connectivity for arguably all of its growth locations. • 6 schemes are planned to improve the A47 with 2 falling within the NPA at Easton and the A47/A11 Thickthorn junction. The collective cost is estimated at £300 million. • Figure 20 shows that junction improvements are planned for most of the junctions on major roads that pass the A47 as they lead into Norwich. • Part of the improvements are likely to include a park and ride at Thickthorn that is expected to cost £30 million. 	<ul style="list-style-type: none"> • Longwater/ Easton/ Cotessey • Broadland Business Park • Norwich Research Park/ Cringleford
<p>A140 Corridor/ Long Stratton Bypass</p>	<ul style="list-style-type: none"> • The Long Stratton Bypass was proposed as part of the Long Stratton Area Action Plan which 	<ul style="list-style-type: none"> • Long Stratton

Key Infrastructure	Description	Growth Locations Principally Supported
	<p>was formally adopted in May 2016.</p> <ul style="list-style-type: none"> The scheme is expected to cost £25 million and facilitate the delivery of 1,800 homes by 2026. The route will relieve traffic through the centre of Long Stratton and improve the route to Ipswich. 	
<p>Norwich International Airport</p>	<ul style="list-style-type: none"> Norwich Airport gives the city an international presence with domestic services linking to locations across the UK and over 1,000 worldwide destinations from the connection at Schiphol, Amsterdam. The airport provides a crucial service given that nearest airport following Norwich is London Stansted which lies 86 miles away. The airport not only forms a transport hub but has attracted businesses in associated sectors to co-locate around the site. To secure the future of the airport, an Aeropark development was proposed which delivered 150 jobs in its first phase. Further phases of the Aeropark have outline consent and once delivered will unlock a further c.850 new jobs 100 ha of land, focused on aviation related. 	<ul style="list-style-type: none"> Supports all with particular focus on: Norwich Airport
<p>Rail Improvements</p>	<ul style="list-style-type: none"> Norwich railway station forms the northern terminus of the Great Eastern Main Line with journey times to London Liverpool Street of less than two hours. Norwich also has rail connections to Midlands and the North, and regional services to Cambridge, Sheringham and Great Yarmouth. Norwich is also the site of Norwich Crown Point Traction 	<ul style="list-style-type: none"> Supports all with focus on: Old Catton Sprowston, Rackheath, St Andrew Growth Triangle Broadland Business Park

Key Infrastructure	Description	Growth Locations Principally Supported
	<p>Maintenance Depot.</p> <ul style="list-style-type: none"> As shown in Figure 20 rail stations have been considered the Rackheath and Broadland Business Park growth locations which would provide regional access to these sites via public transport. An extension of the East-West Rail (EWR) line is also being considered that would connect Cambridge to Bedford and provide direct access to the regional centres of Oxford and Milton Keynes in the South East. 	

Game Changer: East-West Rail

The East West Rail (EWR) line received support in the 2011 Autumn Statement with £270 million confirmed in funding and a subsequent £45 million package from local authorities that make up the EWR corridor. A review of the Eastern Section of the EWR, which will connect to Norwich via existing tracks that require dualling, is being undertaken by Atkins Consultants and conclusions can be expected in May 2017. An update of the economic case undertaken in 2014 by ARUP suggests that the EWR line could boost the regional economy by £72.7 million per annum and deliver a benefit cost ratio (BCR) of 6.3. It can be expected that these benefits would be proportional in the Greater Norwich local economy, and may prove particularly acute given Norfolk's less central location and need for connectivity.

Figure 22: East West Rail Routes



Source: Network Rail, 2017

City centre

- 4.9 The Norwich city centre is the primary employment centre in the Norwich economy. As shown in the property section, the city centre accommodates 68% of the existing floorspace in the NPA and a sizeable amount of industrial floorspace. The core is home a variety of businesses, particularly those within finance and knowledge intensive businesses (KIBs). Further, the core is seeing growth with 100,000m² of office floorspace proposed for the city centre³.
- 4.10 The city centre is also a hub for education and the arts based around the City College, and the Norwich University of the Arts with wider provision, including Easton & Otley College, in the city's rural hinterland. These institutions are critical to supplying the city with a skilled labour force across a range of sectors, including the KIBs, technology and food/land based science and research
- 4.11 Norwich University of the Arts provides a strong supply of graduates in video games art, design, digital photography, and film, underpinning the strength of the local digital technology sector.
- 4.12 The University of East Anglia, is a critical asset to the Norwich economy, attracting students from across the UK and internationally. It provides market leading research and development activity in a range of core growth sectors including environmental science and climate change, health, food science and digital technology and is a key supporting factor in promoting the city on the international stage. Its specialisms in the life and health sciences in particular underpin major links to other hubs such as Cambridge, helping support a wider ecosystem of activity.
- 4.13 Teaching activity in fields such as legal and accounting, computer science, software engineering and film, television and media studies all provide a strong workforce for businesses located in (or seeking to locate in) the city.
- 4.14 A talented labour pool is not only important for meeting the needs of businesses but also helps to contribute to the amenities and services that make a place desirable to live and work. As is shown in the property section, Norwich is one of the most desirable places to live in the UK and this is the result of such amenities as well as factors such as access to good jobs. The city has an historic character, which is supported by the prominence of the Norman castle and cathedral, as well as a strong retail and leisure offer than includes a series of independent stores set within the Norwich lanes. The strength of these amenities was acknowledged within the winning of the Great British High Street Award in 2014 in the city category.
- 4.15 Such amenities are valued for attracting skilled labour and retaining graduates who are some of the most mobile in the UK labour force. However, the city centre has been struggling in recent years to retain office occupancy levels as shown in the property section of this report, albeit some

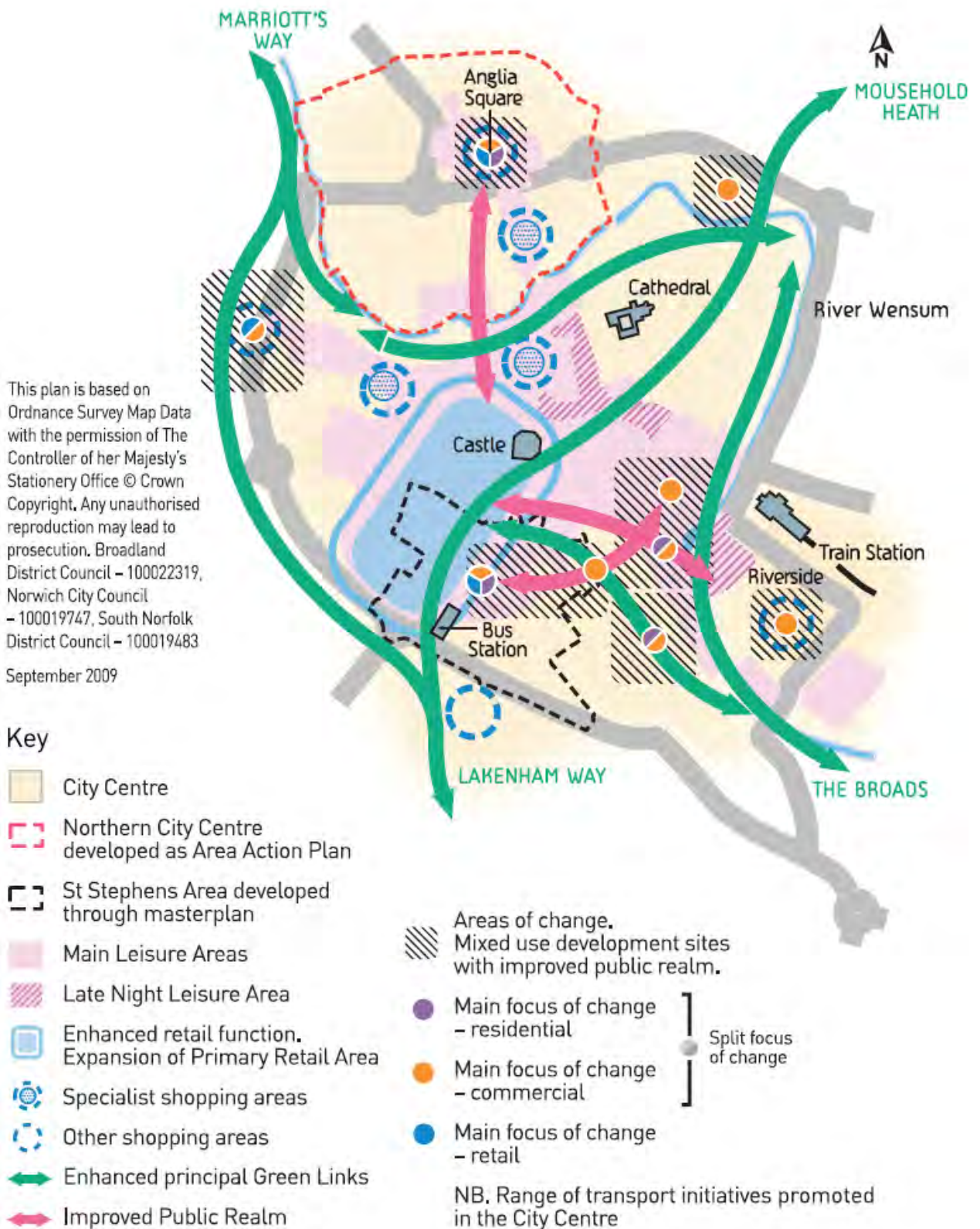
³ CoStar

loss as a result of change of use, and now competes with peripheral locations, exemplified by the relocation of parts of Aviva's activity the centre to the Broadland business park.

- 4.16 Taking a more united approach across the broader NPA area, rather than the local authority level, will aid in managing some of the movements in a way that works for Norwich as a whole. There is, however, scope to attract businesses to Norwich, particular given the noted desirability of the city and the quality of its amenities. The 2016 Tech Nation report⁴ identifies Norwich as an early-stage cluster, with potential across a range of tech sectors and a burgeoning network of tech groups such as Hot Source, Norfolk Developers and SyncNorwich.
- 4.17 Currently, as noted in previous sections, there is an existing stock of space available within the city centre, however only a small share provides the quality and nature of space that is likely to be attractive to suit tech businesses, particularly start-ups. The Tech Nation report notes that co-working spaces such as Whitespace are providing affordable space for startups and helping the market, however our assessment is that further space will be required of the appropriate type/quality.
- 4.18 Tech Nation also noted wider challenges to startups which are gradually being addressed, albeit more could be done. For example the challenge of access to finance is slowly being addressed with schemes such as Grants4Growth. Further, Norwich's key asset is its access to talent, which is commonly found to be the biggest issue for tech firms and KIBs more generally, with the third highest concentration of science and research parks in the country and two leading universities.
- 4.19 As the Tech Nation report finds, Norwich not only has a suite of amenities that are attractive to a range of businesses, but also has an existing cluster of KIB businesses and networks, affordable workspace, finance provision, and skilled labour force that makes the city attract to high value tech businesses. Providing evidence, 5,306 digital tech jobs were identified in Norwich, with many based in the core, creating £148m in GVA from digital firms that increased by 22% between 2010 and 2014. As suggested, there is clear potential to further improve on this existing strength and to build on what differentiates the core from peripheral locations and to attract businesses that prefer to locate in central, 'buzzing' locations.

⁴ http://www.techcityuk.com/wp-content/uploads/2016/02/Tech-Nation-2016_FINAL-ONLINE-1.pdf

Figure 23: Norwich City Centre



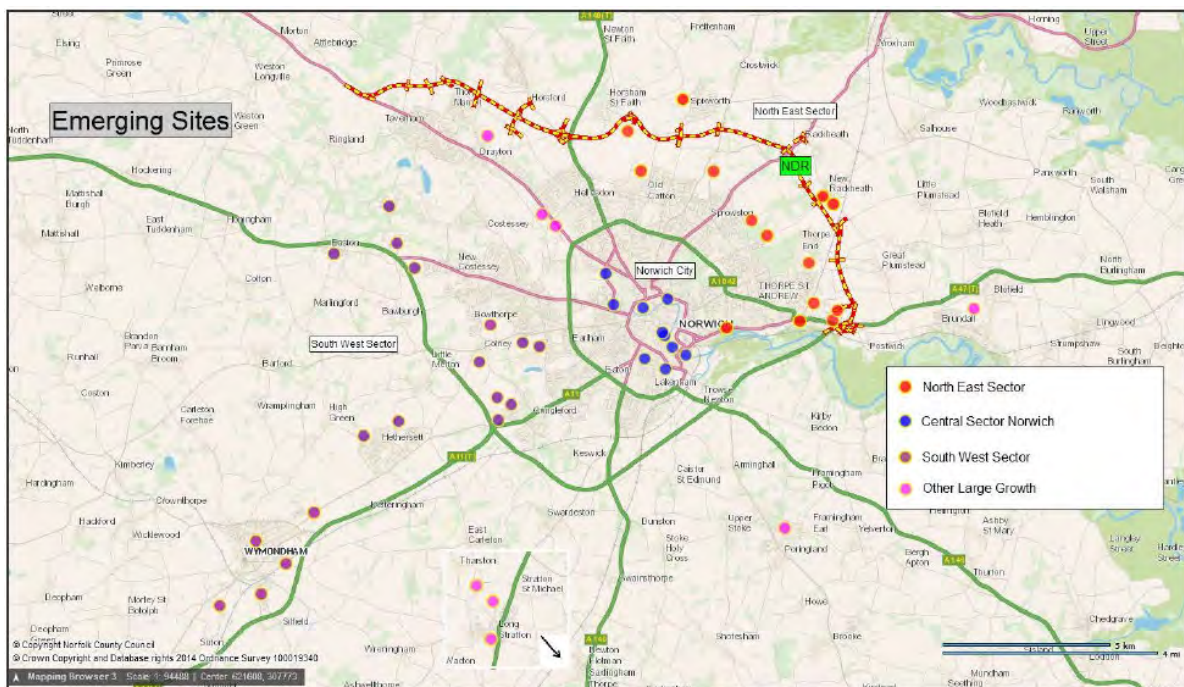
Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

Summary/Findings

4.20 This section shows that the Norwich has series of key assets or ‘Growth Drivers’ that define the Norwich economy and deliver growth within it. The majority of commercial properties are located on or near these assets and, as shown below in Figure 23, many of the emerging sites in the NPA are too. Figure 24 provides a useful illustration showing how Norwich functions as a cluster and the assets that growth locations provide for the area. Overall, this section suggests that the NPA is in fact a good representation of how the Norwich economy functions and, given its existing use within policy, would function well as reference area for future growth potential.

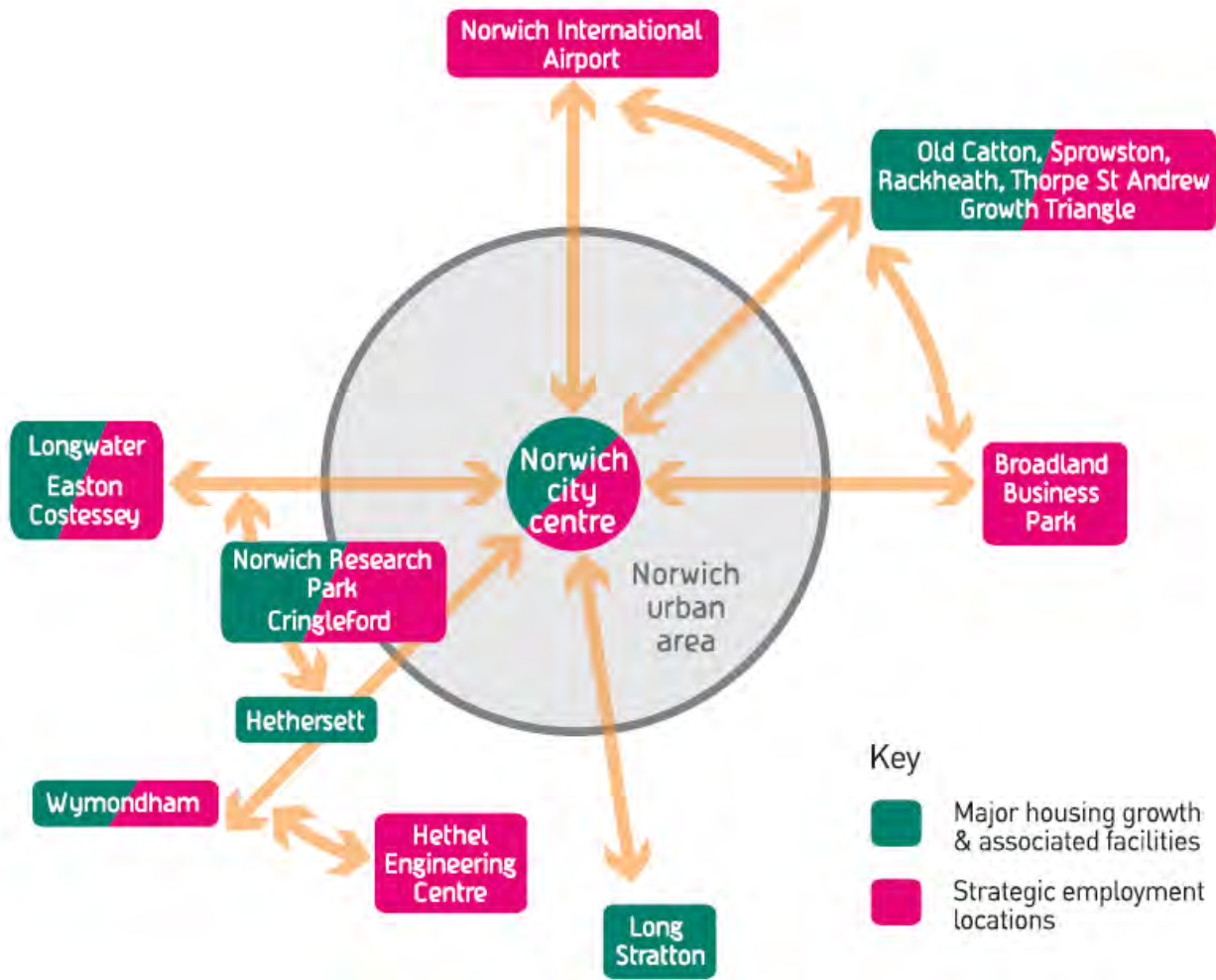
4.21 This section also shows that there is some competition between growth locations in the Norwich that may not be being managed effectively and is causing loss of office occupancy in the city centre. Management at the NPA level will aid to deliver a strategy that works better for Norwich as a whole, creating greater scope to attract more businesses to the NPA as well as better organising movements within it. Other sections in this document focus on growth sectors but this section highlights how the character of the city centre, and the property typology within it, is suited to tech firms and KIBs that function well within city centre locations that support networks and face to face working. There is an existing suite of amenities and services that support tech firms and Norwich would benefit from delivering a strategy that builds on these assets.

Figure 24: Emerging Sites shown to fall in Growth Locations and near Key Infrastructure



Source: Greater Norwich Infrastructure Plan, published in July 2016

Figure 25: Relationships between Norwich Growth Locations



Source: Amended Joint Core Strategy for Broadland, Norwich and South Norfolk, 2014

5. Conclusions

- 5.1 Our analysis explores several political and functional area geographies for Norwich. It illustrates the extent of influence that Norwich has over its sub-regional hinterland and the complexity of its catchments for jobs, labour and homes. Consequently, the local authority area poorly captures extensive growth opportunities positioned on the city's periphery while the overly large Greater Norwich area dilutes the concentration and intensity of more urban economic activity given it incorporates large rural areas and more natural assets such as the Broads. The analysis shows that NPA is useful reference geography because, it closely aligns with the functional economic areas and the majority of assets that are of strategic importance are located within this area.
- 5.2 Overall the property analysis suggests a lower demand for office space than industrial space across the NPA which is particularly acute in the city centre. Although a long term trend is difficult to pinpoint, there does appear to be some reduced activity in the office market. Examples such as the relocation of some of Aviva's activity from the core to the Broadland Business Park as well as potential negative impacts surrounding outcomes of the current political climate (such as Brexit) does suggest a need to capture changing needs of office and industrial typologies in line with location, occupier needs and sectoral focus.
- 5.3 When looking at the physical growth drivers in terms of infrastructure and growth locations, we found that there are points of significant infrastructure led growth locations that are coming forward in the Norwich Policy Area. Each of these growth locations are based on economic cores that are expected to be led by priority or growth sectors (referenced in the Part II and III of this report). Overall, our analysis shows that the NPA is in fact a good representation of the Norwich economic influence and, given its existing use within policy, would function well as reference area for the reach and extent of the Norwich economy.