

# Greater Norwich Development Partnership Policy Group

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Minutes of a meeting of the **Greater Norwich Development Partnership Policy Group**, held at City Hall, St Peter's Street, Norwich on **Thursday, 19 February 2009 at 1.00 p.m.** when there were present:

Councillor Steve Morpew – Chairman

Councillor Stuart Clancy  
Councillor Roger Foulger  
Councillor Andrew Proctor  
Councillor Simon Woodbridge  
Councillor Brenda Arthur  
Councillor Steve Morpew  
Councillor Brian Morrey  
Councillor Alan Waters  
Councillor Derek Blake  
Councillor Colin Gould  
Councillor John Fuller  
Councillor Martin Wynne  
Councillor Eve Collishaw  
Councillor Daniel Cox  
Councillor Adrian Gunson  
Councillor Brian Iles  
Mr Alan Mallett

Representing:-

Broadland District Council  
Broadland District Council  
Broadland District Council  
Broadland District Council  
Norwich City Council  
Norwich City Council  
Norwich City Council  
Norwich City Council  
Norwich City Council  
South Norfolk Council  
South Norfolk Council  
South Norfolk Council  
South Norfolk Council  
Norfolk County Council  
Norfolk County Council  
Norfolk County Council  
Norfolk County Council  
The Broads Authority

Phil Kirby  
Roger Burroughs  
Sandra Eastaugh  
Jerry Massey  
Graham Nelson  
Paul Rao  
Sandra Dinneen  
Andrew Gregory  
Tim Horspole  
Phil Morris  
Richard Doleman  
Mary Marston

Broadland District Council  
Broadland District Council  
GND Partnership Manager  
Norwich City Council  
Norwich City Council  
Norwich City Council  
South Norfolk Council  
South Norfolk Council  
South Norfolk Council  
Norfolk County Council  
Norfolk County Council  
Go-East

## **1 APOLOGIES FOR ABSENCE**

Apologies for absence were received from Mike Jackson, Norfolk County Council and Chris Starkie, Shaping Norfolk's Future.

## **2 MINUTES**

The minutes of the meeting held on 18 December 2008 were confirmed as a correct record.

## **3 CONFERENCE CENTRE AND CONCERT HALL FOR THE GREATER NORWICH AREA**

Kevin Kaley of Tourism UK Ltd gave a presentation on the findings of a feasibility study on a conference centre and concert hall for the Greater Norwich area.

**RESOLVED** to note the position.

## **4 JOINT CORE STRATEGY**

Phil Kirby referred to the reports circulated with the agenda and further papers tabled at the meeting on the next steps and proposals for public consultation.

He commented on the main issues raised in the Planning Inspector's report. In order to address concerns raised about the evidence available to support some proposals a further Option 2+ had been developed which removed Mangreen from the allocation in the Joint Core Strategy but, as part of preparatory work for the next JCS, required a separate full evaluation of the options for future long term growth including new settlements such as Mangreen. He pointed out however that the numbers of dwellings currently proposed for Long Stratton were unlikely to be sufficient to deliver the bypass and other community benefits. The evidence trail for the development of revised Option 2A was appended to the paper tabled at the meeting on the next steps. If this revised option was approved it would be possible to stick to the current timetable for consultation in March and submission of the Joint Core Strategy to the Secretary of State in the Autumn.

A member referred to paragraph 15 of the Planning Inspector's report which indicated that at submission it would be necessary to have evidence that all infrastructure providers agreed there was a reasonable prospect that the crucial components of infrastructure could be provided at the appropriate time. As far as he was aware none of the infrastructure providers had signed up to this. Indeed the Highways Agency were saying they hadn't got money for infrastructure and the NDR had been delayed for two years. Phil Kirby however pointed out that an infrastructure study was now available and discussions would be undertaken with infrastructure providers. He hoped that the necessary commitments would be forthcoming prior to the submission of

the Joint Core Strategy in November.

**RESOLVED :-**

- (1) to note the contents of the Inspector's report;
- (2) having regard to the concerns raised agree Option 2+ as the single favoured option on which to proceed to public consultation;
- (3) GNDP to commission and fund the necessary feasibility studies to support the development of new settlements as the preferred option of the GNDP for future growth within South Norfolk's current boundary. Mangreen will remain as the preferred location within South Norfolk unless fundamental concerns arise as a result of this study work with regard to its justification;
- (4) the scope of the study, briefs, procurement and outputs to be agreed by the GNDP Policy Group;
- (5) the GNDP Partners undertake to support the outcomes in considering the location of future growth of the area at the first review of the Joint Core Strategy; and
- (6) grant delegated authority to the GNDP Directors Group to agree the necessary amendments to the consultation documents to reflect these decisions.

## **5 GROWTH POINT FUNDING 2009-2011**

Jerry Massey presented the report together with a further paper on NRP funding priorities prepared for EEDA by sub-regional stakeholders represented by the Norwich Vision Group.

He referred to the project spend in 2008/09 and the balance available for the remaining two years up to March 2011. The Directors Group were recommending that projects for The Genome Analysis Centre and the Institute of Food Research 2 should be approved as essential. It was then necessary to decide which of the other strategic projects should also be supported.

A member referred to the need for further business case information on the other strategic projects in terms of what they would deliver, feasibility, potential leverage of other funding and overall value for money before a

decision could be taken on how the remaining funding should be allocated. Sandra Eastaugh said that an analysis of this nature had already been provided for the Directors Group.

**RESOLVED** to:-

- (1) approve the approach to the allocation of funds as set out in the report and support the projects for the Genome Analysis Centre (£500,000) and the Institute of Food Research 2 (£1m) as essential; and
- (2) defer a decision on what other strategic projects should be supported to the next meeting pending further information on the detailed evaluation work undertaken into those projects.

**6 DATES OF FUTURE MEETINGS**

**RESOLVED** to agree future meeting dates as follows:-

Thursday 19 March 2009 at 2.00 p.m.  
Thursday 25 June 2009 at 2.00 p.m.  
Thursday 24 September 2009 at 2.00 p.m.  
Thursday 17 December 2009 at 2.00 p.m.

CHAIR

## Joint Core Strategy – next steps

### **1. Background**

- 1.1 The Planning Inspector's review took place on 27 January as planned. The Inspector's draft report was received on 3 February. A copy of the draft report was circulated to Members as part of the papers for the GNDP Policy group meeting on 19 February.
- 1.2 The final version of the Inspector's Report was received on 17 February - (to be tabled on 19 February GNDP Policy Group meeting). This does not differ substantially from the draft report previously circulated.
- 1.3 The Planning sub-group prepared a response to the Inspector's draft report which was also circulated as background information with the papers for the GNDP Policy group meeting on 19 February.
- 1.4 The Inspector met with the GNDP Directors on 12 February to talk through her draft report, to clarify any items and to answer questions.

### **2. Next Steps**

- 2.1 Based on the evidence currently available an option close to Option 2a has been developed which is expected to be able to address the concerns raised by the Inspector. This option has the sentiment of Option 2a but removes Mangreen from the allocation in the Joint Core Strategy and commissions a separate full evaluation of the options for future long-term growth including new settlements, such as Mangreen.
- 2.2 The Inspector's report highlighted Mangreen as the principle element where evidence to justify its inclusion is most lacking. Mangreen would not be included as any form of allocation in the current Joint Core Strategy but it would be recognised that a significant study will be undertaken to assess the options for new settlements in the area and in particular Mangreen. It is envisaged that such a study would be sufficiently rigorous for all parties to have confidence in its recommendations.
- 2.3 This will be a significant undertaking with resource and cost implications. The study work listed in table 1 would be required but as a basic evidence trail can be established (see appendix 1) it is considered reasonable for this to be conducted in parallel to the consultation.

**Table 1: Further Areas of Study to evidence Option 2a**

<b>Study</b>	<b>Lead</b>	<b>Timeline</b>
Public Transport	County Council	2 Months
Education solutions	County Council	1 Month
Long Stratton - Viability assessment on the proposed scale of development and the ability to fund the required infrastructure.	Developer	3 Months
Hethersett/Cringleford - Impact of growth on availability of land at NRP for long term employment need.	South Norfolk Council	1 Month
Wymondham - Impact of growth on availability of land in Wymondham for long term employment need.	South Norfolk Council	1 Month
Detailed specific assessment of consultation responses	South Norfolk Council	2 Months
Identify from the consultation responses, deficiencies in all other growth options and how 2a overcomes these		
Assessment of development on settlement pattern in South Norfolk	South Norfolk Council	2 Months
Impact of growth in NPA on Strategic Gaps	South Norfolk Council	1 Month
Accessibility assessment	County Council	2 Months

2.4 It is likely that the review of the Joint Core Strategy, informed by the study, would begin in 2011/12 to address the review of the RSS. It could be fast-tracked owing to the largely developed evidence base. The new settlement proposal would be included at that review – in time for it to begin in 2018 as currently proposed.

2.5 The Partnership will need an agreement in place to ensure the outcome of the study is supported by all parties. The scope of the work, briefs, procurement and outputs would be signed off by the GNDP Policy Group.

**Note:** Funding for the study will need to be agreed by the Partnership.

Appendix 1 sets out the evidence trail for this scenario to show that Option 2a, without the Mangreen allocation, can be evidenced.

**2.6 Effect on Timetable**

This would have no impact on the timetable and the consultation could go ahead as planned in March, with submission of the Joint Core Strategy to the Secretary of State remaining at November 09.

Norwich Advisory Visit, January 2009 – Draft comments

*Background to the advisory visit.*

1. As you know, the purpose of my visit is not to test material in the way that is done at the DPD examination, and I cannot confirm that any work done is adequate or that any part of the DPD is sound, or unsound. Quite apart from not having the time to do this, it would be entirely inappropriate to pre-judge matters that should properly be considered at the examination. My aim is to prompt you to think about matters and questions that appear at this stage to be potentially contentious or problematic.
2. Following the issues and options consultation in the winter of 2007/8, the GNDP carried out a technical consultation (under Reg.25) in August/September 2008. This consultation featured three options for accommodating major development.
3. In view of the time constraints, I make some general comments on the evidence base and have then focussed on the options for major development, as that appears to be the most contentious issue. I do not comment in detail on procedural matters or organisational issues.

*General comments*

4. A CS should include an overall vision which sets out how the area and the places within it should develop, strategic objectives focussed on key issues and a delivery strategy for achieving these objectives, as well as arrangements for monitoring and managing delivery. (PPS12 para 4.1). The basic questions to be addressed in a CS are (see PAS Manual):
  - **What** will be delivered
  - **When** will it be delivered
  - **How** will it be delivered
5. This strategy must be justifiable: that is founded on robust and credible evidence and the most appropriate strategy when considered against the reasonable alternatives. (PPS12 para 4.36) The choices made in the CS need to be backed up by research/fact finding. And the CS must be effective, that is deliverable, flexible and able to be monitored. (PPS12 para 4.44)
6. So far as consultation is concerned, the new regulations encourage a targeted approach, and I can see no obvious reason why the work undertaken so far would conflict with the Regulations. You will also need to demonstrate that the requirements of the SCIs for the constituent authorities have been met, and this is one of the matters covered in the PAS self-assessment toolkit.

7. It is not part of my brief to comment on propriety or decision-making structures. I understand PAS has already undertaken a diagnostic visit which will have covered some of these issues.

#### *Evidence base*

8. This should be proportionate, relevant and as up to date as practicable. The Inspector will not examine the evidence base as an end in itself, but may need to look at aspects of it in detail when considering the soundness of a strategy or policy.
9. The key evidence should be in place before submission. A rigorous approach to appraising all reasonable options will help to dispel any impression of justifying a predetermined stance. If a thorough approach to preparing the CS has been followed and the audit trail properly documented, there should be little need for additional information to be produced after submission.
10. In the context of this exercise, it would be inappropriate for me to come to any firm conclusions about the adequacy, or otherwise of the evidence base in general terms. However, it is evident that a good deal of work has been undertaken and much of the work that would normally be expected has been done (SHLAA, SHMA, SFRA, retail and employment studies etc.) Once you have a draft of the CS you may wish to critically evaluate what is the justification for each policy and proposal and what are the facts/analysis that back this up.
11. I note that a sustainability appraisal has informed the work undertaken to date. The appraisal has been audited by a firm of consultants who are known to have considerable expertise in this field of work. I have not looked in detail at the SA, but I assume it is available for public scrutiny. It should also be borne in mind that SA is intended to be an iterative process, and that as further details of development proposals are clarified, there will be a need to revisit the SA.
12. Similarly, I have not checked the contents of individual consultation responses against the summaries given in the committee reports before me. However, the detail in the reports would enable respondents to identify their responses and it would be open to them to comment if they felt the summaries to be inaccurate or misleading.
13. So far as the relationship between the Sustainable Community Strategies and the CS is concerned, it may be useful to have greater cross-referencing in the final form of the CS.
14. One key area of work is the Infrastructure Need and Funding Study. An early study was completed in 2007, and further work is now being undertaken by the same consultants. Given the scale of growth programmed for the NPA, and the levels of



infrastructure necessary to accommodate it, I consider this work to be a key component in ensuring that the CS can meet the 'effectiveness' test of soundness.

15. I note that the study brief includes requirements for assessments of all infrastructure requirements, costings, timings, and sources of funding. It will also consider the appropriateness of a CIL approach. You advised me that it will include a viability assessment to underpin policies for affordable housing. There is some reference to this in the brief, but you may wish to confirm that this work will meet the requirements of PPS3, in the light of the Blyth Valley judgement (see separate note prepared by a colleague Inspector). At submission you will need to have evidence that all infrastructure providers agree that there is a reasonable prospect that the crucial components of infrastructure can be provided at the appropriate time. As yet, there is little information on when, during the plan period, the various growth locations are expected to be implemented. The level of detail required on infrastructure provision will be greater for those schemes expected to deliver at an earlier point in the plan period. For larger schemes, what is the expected phasing and how does this relate to the delivery of infrastructure?
16. I note the concern expressed by the GO regarding Appropriate Assessment under the Habitats Directive. You advised me that work is progressing but appears unlikely to generate any show-stoppers. This work will need to be made available for public inspection.

#### *Options for major development*

17. The Regulation 25 Technical Consultation outlined 3 options. All three options adopt the same approach to the quantum and location of growth in Norwich and Broadland. The options differ in their approach to locations for growth within South Norfolk.
18. It would be helpful to provide a clear audit trail of the alternatives considered for Norwich and Broadland, and the reasons for decisions taken. All reasonable options should be evaluated. It may be that within the City the options are highly constrained because the boundary is so tightly drawn. If that is the case, and there is no clear evidence to the contrary, it need not be a lengthy explanation. There may be a need for further work to provide an audit trail for the spatial choices in Broadland, but this should hopefully be a case of drawing together work already undertaken, rather than commissioning new studies (expand on para 1.4 of 18 December Policy Group item 5a). As an aside, it is encouraging to note that the Eco town proposal at Rackheath would not be a departure from the preferred growth strategy.
19. So far as the 3 options for South Norfolk are concerned, a comprehensive analysis of all three has been prepared, which

includes the summaries of consultation responses, advantages, disadvantages and risks. A further option, described as 2a, has subsequently been introduced. The only information I have seen relating to this option is a short paper (2.5 sides of A4), and a limited evaluation by GNDP Officers in the covering Committee report of 18 December. It is described as an evolution of Options 2 and 3. It redistributes proposed housing development between the locations identified in those options.

20. The paper states that the option has taken account of two strategic planning principles. It is not clear how these principles relate to national or regional policies, or to the vision and strategy set out in the Reg 25 consultation document. Will these principles stand up to the scrutiny they will be subjected to when the CS is subject to examination. For example, under a), why is the retention of strategic development gaps an overriding concern? (Urban extensions are often considered an appropriate way of accommodating new growth). Does the scale of growth proposed along the A11 corridor under Option 1 justify the conclusion that it would lead to a single urban extension? Under b), does central necessarily equal accessible, or is accessibility, particularly by public transport, a better indicator of accessibility?
21. There is nothing before me to demonstrate that this option has been evaluated in the same way as the options outlined in the Reg 25 consultation. On the face of it, it may be difficult to do so without further work, because no consultation has been carried out on this particular spread and of development. Even relatively minor adjustments in the quantum of development proposed at different locations can have a marked effect on the ability to deliver necessary infrastructure. I note, for example, that EERA expresses concerns about funding for the Long Stratton bypass, and public consultation responses at the issues and options stage appear to be equivocal about the level of growth that would be appropriate.
22. At the examination, the Inspector will assess whether the plan is the most appropriate when considered against reasonable alternatives. For the avoidance of doubt, I am not concluding that Option 2a is, or is not, the most appropriate. However, there is at present very little evidence to support a conclusion that it is. Without such evidence, there is a real risk that a Core Strategy based on Option 2a could be found unsound.
23. It seems to me that further work would need to be carried out on option 2a, particularly in relation to sustainability appraisal; deliverability; and its relationship to the overall vision and strategy.

*Conclusion*

24. It is evident that the GNDP has carried out a considerable amount of work towards the preparation of a joint CS, and the level of joint working between the three authorities is to be commended. However, work remains to be done to provide an audit trail demonstrating that the strategy is founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives. In my view, further work is required, and in particular a full evaluation of option 2a, before you could proceed with confidence to the Examination.

*Laura Graham*

2 February 2009

Further comments raised by the GO, in the event of the breakdown of the Partnership.

To what extent could earlier work, including SA, be relied upon as a basis for consulting on separate preferred options?

It is difficult to comment as a generality, because of the differing circumstances of the constituent authorities. In my view it would depend on the extent to which the emerging separate strategy differed from the previously agreed approach.

How can three separate CS satisfy the RSS requirement for the NPA?

Policy NR1 seeks joint or co-ordinated LDDs. Separate Core Strategies would still require a high level of co-ordination. Otherwise it would be difficult for the Inspector(s) to ensure that the aims of the RSS would be met in a comprehensive and co-ordinated fashion. However, if a clear apportionment of growth requirements could be agreed between the authorities and any cross-border issues addressed satisfactorily, it may not be an impossible task.

## Planning Inspectorate, Norwich Advisory Visit, January, 2009

### Response to the draft comments

#### 1. Purpose of the visit

The inspector is clear that the purpose of her visit and assessment of work undertaken so far is to highlight matters she considers potentially contentious or problematic. She makes the point very clearly that she cannot offer a judgement as to whether the work undertaken so far is likely to be found sound or unsound. As no third party evidence was considered, this limitation on the scope of the advice is inevitable.

#### 2. Main points made by the Inspector

##### **General approach**

The inspector notes that the key tests that JCS must pass are that it should be:

- Justifiable (substantiated by robust and credible evidence; the most appropriate strategy when considered against the reasonable alternatives. The choices made in the Core Strategy need to be backed up by research/fact finding)
- Effective (deliverable; flexible; able to be monitored)

It is consideration of these of tests that colours her conclusions.

##### **Consultation**

In general the inspector supports the consultation work done to date noting that it is appropriate for initial consultation work to be targeted (para 6) and comments that consultation undertaken to date has been reported back clearly (para 12)

##### **Evidence**

The inspector notes that evidence gathered must be subject to an audit trail leading to the conclusions drawn. She notes (para10) that a broad range of evidence has been gathered including much which an inspector would normally expect. She also notes, that some critical work, dependent on the proposed distribution of growth, is still in progress, notably the infrastructure requirements and funding study (EDAW) and the water cycle study stage 2 B ( Scott Wilson) (paragraphs 14 and 15). The PSG is confident that there is an audit trail to support the work leading up to Policy Group on 18 Dec and can clearly demonstrates how the evidence presented to members was arrived at.

##### **Sustainability Appraisal/ Appropriate Assessment**

The inspector notes (paragraph 11) that SA work has been undertaken and audited by a reputable company. It is reasonable to conclude that this process would have highlighted any glaring inadequacies. Similarly, though based on an

assurance, the inspector accepts that Appropriate Assessment work is being undertaken (paragraph 16)

### **3. Concerns highlighted by the Inspector**

It is reassuring to note that the inspector is supportive of the partnership work of the GNDP, and much of the work undertaken so far. She does, however, articulate some unmistakable and serious concerns:

- 1 The fact that all options are common in Broadland and Norwich (paragraph 18). She goes on, however, to note that it may well be possible to draw on earlier work and provide a clear audit trail of evidence/sustainability appraisal work to demonstrate why alternatives have been rejected by this stage. This should be feasible based on the issues and options consultation, the views of technical consultees such as Children's Services, and evidence including the water cycle study, public transport studies, etc, for Broadland, and capacity work and the need to accommodate other uses on a scale indicated in the economic growth study and retail/town centres study in the case of Norwich.
- 2 The inspector notes the appraisal of three options in South Norfolk but draws no conclusions as to their relative merits (paragraph 19). She raises questions about the way option 2a has emerged (paragraphs 20-23) from Policy Group on 18<sup>th</sup> December. The areas of risk she highlights appear to be:
  - There is no clear reasoning advanced to justify the selection of option 2a. (para 19)
  - It is not clear how the two strategic planning principles which have been articulated to promote option 2a relate to region and national policies. This link needs to be drawn otherwise there is a risk that they will not stand up to scrutiny. (para 20)
  - There has been little evaluation of the option as it emerged from Members at the Policy group meeting on 18<sup>th</sup> December and was not included within the consultation exercises undertaken a previously (para 20)
  - There is no clear link between the favoured option and the vision and objectives that have been consulted upon. (para 23)

In paragraph 22, the inspector states "for the avoidance of doubt, I am not concluding that option 2 A is, or is not, the most appropriate. However, there is at present very little evidence to support a conclusion that it is. Without such evidence, there is a real risk that a core strategy based on options 2 A could be found unsound." This is a significant point and quite clearly points to a deficiency in the evidence base to support option 2a.

Members should note that, following the conclusions of the GNDP policy group and endorsement by the constituent authorities, some sustainability appraisal work has been undertaken on option 2a and passed to Scott Wilson for validation.

The inspector poses some direct questions as to how Option 2a emerged from the evidence put before members of Policy Group on 18 Dec and the audit trail. The gaps can be expressed as two questions:

- Why are options 2&3 favoured over option 1?
- What are the shortcomings of options 2&3 and how are these resolved by the favoured option (2a)?

The only information that currently exists to address these questions is the statement prepared by SNDC to support the promotion of option 2a. The inspector is clear that the short paper does little to evidence 2a. She cites in paragraph 20 two examples. Unless there is evidence to justify and support 2a there is a real risk to the soundness of the Joint Core Strategy.

Members need to consider the importance of this statement and should closely examine the evidence put before them and whether it leads to option 2a. The Inspector concludes that there is little evidence to do so.

The absence of a clear link between evidence and the selection 2a could arise from 2 causes:

- There are gaps in the evidence gathered that prevent the link to option 2a being clear
- Sufficient evidence has been gathered, but it does not point to option 2a

It is important that Partners minds remain open to both possibilities.

If Members wish to continue pursuing option 2a then it is clear that the option needs further and robust evidence to provide answers for the 2 questions posed above. The rationale for 2a is set out in the paper presented to policy group by SNDC and it follows that there is a need to look at the reasons put forward and evidence them in more detail. What cannot be prejudged is what the evidence will conclude.

#### **4. Addressing the concerns**

The Planning sub group recommends that the studies set out in table 1 are required to evidence the statement prepared by SNDC in support of option 2a. There are two reasons for new studies. The first, decision making studies, are needed to provide evidence for the decision (audit trail) to support option 2a. The second, implementation studies, are needed to better understand implementation. Some studies will do both. The decision making studies will need to be completed before consultation on option 2a can commence.

Should the new decision making studies point to 2a being a sound approach, then this will have delayed consultation by about 4 months. At this time it is estimated that the cost of the identified additional studies will be about £50k. This estimate

assumes a number of the studies will be carried out in house by GNDP partners which will have a staffing resource implication.

Should the new decision making studies **not** point to 2a being favoured, then a new growth option will need to be agreed. Unless this new option can be evidenced from existing work then studies informing the implementation of the strategy will need to be refreshed for the new growth option.

These studies are identified as;

- Infrastructure growth and funding
- Transportation/NATS implementation
- Education
- Public Transport
- Long Stratton - Viability assessment (should the scale change)
- Water Cycle Study Phase 2b
- Sustainability Appraisal
- Renewable energy study

Updating these studies to evidence a new option will introduce further delay to the preparation of the Joint Core Strategy and will require additional funding. Costs cannot easily be clarified as some studies will require a full review and others will only need adjustments to the elements of growth that have changed.

Based on the Inspector's report the choices seem to be

- 1 Continue to promote option 2a subject to evidence strongly supporting it over other options, that will delay public consultation by about 4 months.
- 2 Revert back to option 1 or 2, consultation can continue on current timetable.
- 3 Revert to Option 3. This will still require Mangreen feasibility and delay consultation by 2 months.
- 4 Propose a new option that reflects the sentiments of Option 2a based on current evidence. No delay to current timetable.
- 5 Propose an entirely new option. Estimated delay 4 months.

**Question to the Inspector – would it help to run a further round of consultation including 2a?**

## **5. Recommendation**

The quickest way forward keeping to the current timetable would be to pursue an option that reflects the sentiment of Option 2a but is drawn from current evidence and uses the latest housing monitoring information. (Choice 4 above)



Table 1  
Further Studies required to evidence Option 2a - timelines and costs

Study	Scope of the study to evidence 2a	Timeline	Cost	Decision or Implementation
Historic environmental impact	1,2,3, Favoured	4 Months	Internal £30k	D
Infrastructure growth and funding	Favoured	5 Months	Funded (£100k)	I
Transportation/NATS implementation	Favoured	4 Months	Funded (£100k)	I
Public Transport	Favoured	2 Months	Norfolk CC £2k	D/I
Education	Favoured	1 Month	Norfolk CC	D/I
Mangreen Studies	Favoured	2 Months	Developer Norfolk CC Costs to LAs included in other studies	D/I
Promoter/Developer response required Infrastructure View on economic viability Minerals and Waste (timetable)				
Transport Impact on southern bypass junctions (County) Public Transport Study (briefed by GNDP by carried out by external consultants)				
Viability (at planned scale)				

**Background information**

<b>Study</b>	<b>Scope of the study to evidence 2a</b>	<b>Timeline</b>	<b>Cost</b>	<b>Decision or Implementation</b>
Long Stratton - Viability assessment on the proposed scale of development and the ability to fund the required infrastructure.	2,3, Favoured	3 Months	Developer	D/I
Hethersett/Cringleford - Impact of growth on availability of land at NRP for long term employment need.	1,2, Favoured	1 Month	SNC	D
Wymondham - Impact of growth on availability of land in Wymondham for long term employment need.	1,2,3, Favoured	1 Month	SNC	D
Detailed specific assessment of consultation responses  Identify from the consultation responses, deficiencies in all other growth options and how 2a overcomes these	N/A	2 Months	SNC	D
Assessment of development on settlement pattern in South Norfolk	1,2,3, Favoured	2 Months	SNC	D
Impact of growth in NPA on Strategic Gaps	1,2,3, Favoured	1 Month	SNC	D
Accessibility assessment	1,2,3, Favoured	2 Months	NCC £10k	D
Sustainability Appraisal	Favoured	1 Month	GNDP PSG	D

Evidence trail for option development

Location	Evidence for Option 1	Option 1	Evidence for moving from Option 1 to Option 2	Option 2	Evidence for moving from Option 2 to Option 2+	Option 2+ (with revised location descriptions)
Norwich	Strategic Housing Land Availability Assessment	4000	No Change	4000	Revised housing monitoring information updated to 2008	Norwich 3000
Broadland smaller sites	Local knowledge of sites that may come forward. Provide range of size of sites.	2000	No Change	2000	No Change	Broadland allowance for smaller sites and possible additions to named growth locations 2000
South Norfolk smaller	Local knowledge of sites that may come forward. Provide range of size of sites.	2000	No Change	2000	Analysis suggests opportunities for smaller allocations may be more limited.	South Norfolk allowance for smaller sites and possible additions to named growth locations 1800
North East (Sprowston/Rackheath area)	Previous work carried out by Broadland for their core strategy issues and options. JCS issues and options assessment of growth locations.	6000 (rising to 10000 post 2026)	No Change	6000 (rising to 10000 post 2026)	Eco-community at Rackheath will help delivery rates.	Old Catton – Rackheath – Thorpe – St. Andrew Growth Triangle 7000 (rising to 10000 post 2026)
South West (Hethersett/Little Melton area)	A11/B1172 best bus corridor into Norwich. Accessible to strategic employment sites. Location could accommodate large scale growth building on and significantly improving existing services at Hethersett. Scale needed to deliver secondary education. Joint Core Strategy Issues and Options assessment of growth locations.	4000 (rising to 7000 post 2026)	No Change	4000 (rising to 7000 post 2026)	Representations for 2500 at Colney Cringleford within the Norwich Southern Bypass. Limited growth at Hethersett. Reflects political concerns of impacts of large-scale growth on the area. Both locations benefit from the proximity to a good bus corridor and strategic employment sites.	South West Hethersett 1000 Colney/Cringleford 1200
West (Costessey/Easton area)	Close to strategic employment areas On Dereham Road bus corridor Potential to create/enhance centre for Easton	2000	No Change	2000	Focus on Easton (Costessey element in small sites/contingency allowance). Reduced growth eases education capacity pressures.	Easton 1000
Wymondham	Rail Station and A11/B1172 a good bus corridor. A good range of local services and accessible to a range of employment opportunities.	4000 (rising to 5000 post 2026)	Removal of 2000 dwellings lessens impact on historic market town. More complex education solution.	2000	Slight increase recognising potential of Wymondham as a location with local services and strategic employment opportunities and strong public transport opportunities. Education solution remains unclear	Wymondham 2200
Long Stratton		0	Addition of location. Development delivers bypass. Improves strategic route to south A12 corridor. Improves environment of Long Stratton.	2000	Decrease to reflect public responses to the scale of growth in Long Stratton. Funding of the full range of infrastructure and affordable housing requires further analysis as highlighted in the Inspectors' report.	Long Stratton 1800
General Comment	Option that emerged from technical evidence gathering	Total 24000	Benefits to Long Stratton and delivery of unfunded County Council major scheme outweigh poor accessibility to jobs and public transport and the more complex education solution at Wymondham	Total 24000	Delivers less dwelling, reflecting latest monitoring information. Distribution looks to echo the political sentiment whilst remaining reasonably consistent with evidence.	Total 21000