

Joint Core Strategy Proposed submission Document

O - 11165 - 8456 - 01Our Strategy - i, ii, iii

11165 Object

CHAPTER 1 01Our Strategy

Respondent: Mr Norman Castleton [8456]

Agent: N/A

Full Text: Joint Core Strategy for Greater NorwichI believe that the proposals and plan to build the:Northern Distributor Road

the housing and allied developments (including the Eco-Town) in and around Old Catton, Sprowston, Rackheath, Thorpe St. Andrew, Cringleford, Easton and Old Cotesseyis not sound and that it is not justified, effective, and consistent with National Environmental Policy inclusive of the statement:"We need to avoid making the problem worse, so cutting carbon emissions is a priority. But all of us - individuals, businesses, Government and public authorities - will also need to adapt our behaviour to respond to the challenges of climate change"[<http://www.defra.gov.uk/environment/climate/index.htm>]and the cited Norwich City County Council and Norfolk County Council environmental policies. Firstly there is the statement of the 'Precautionary Principle' on the Norwich City Council website i.e. "The goal of sustainable development is to enable people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations.Then the eleven statements of Norfolk County Councils environmental policy and in particular paragraphs 1 to 3 [<http://www.norfolk.gov.uk/consumption/groups/public/documents/article/ncc054875.pdf>]. To build the Northern Distributor road will contravene these statements of environmental policy because:building the new roads on undeveloped land will not solve the traffic problems in and around Norwichthis because of the 'Rebound Effect' i.e. The building of new roads always results in greater density of vehicles/use and thereby results in the emission of more greenhouse gases. The building of more and more houses on greenfield sites will:only intensify the effect of adding more and more pollution even when taking the Eco Town proposals into consideration. Future additional housing should be of a lower local magnitude and built in low density on accessible brown-field sites to reduce services and communication impacts and thereby reduce the effect of carbon and allied greenhouse gas emissions.Transport and communications based on sustainable methodology with less reliance on fossil fuels e.g. public transportThe proposals as they exist in the Joint Core Strategy will infringe all the national and local environmental policies as cited above.N.L.Castleton

Summary: Objection raised about lack of sustainability and environmental responsibility to reduce greenhouse gas emissions as measured against National and local council Environmental Policy declarations.

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CHAPTER 1 01Our Strategy

Respondent: Mr Norman Castleton [8456]

Agent: N/A

Full Text:

Summary: Objection raised about lack of sustainability and environmental responsibility to reduce greenhouse gas emissions as measured against National and Local Council Environmental Policy declarations.

Joint Core Strategy Proposed submission Document

O - 11181 - 6883 - 01Our Strategy - i

11181 Object

CHAPTER 1 01Our Strategy

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: The document claims that the Northern Distributor Road (NDR) will "enhance the living conditions for those residents who live in the northern suburbs, and to enable improvements to be made to buses, cycling and walking routes." But building this road will, at best, only improve conditions in the very short term. The road will cause increased car journeys as extra road capacity is provided and will allow further suburbanisation of the fringes of Norwich. This will adversely affect residents' quality of life. NDR will also take money from more deserving transport projects (e.g. cycle lanes, public transport).

Summary: The document claims that the Northern Distributor Road (NDR) will "enhance the living conditions for those residents who live in the northern suburbs, and to enable improvements to be made to buses, cycling and walking routes." But building this road will, at best, only improve conditions in the very short term. The road will cause increased car journeys as extra road capacity is provided and will allow further suburbanisation of the fringes of Norwich. This will adversely affect residents' quality of life. NDR will also take money from more deserving transport projects (e.g. cycle lanes, public transport).

Joint Core Strategy Proposed submission Document

S - 11215 - 8524 - 01Our Strategy - None

11215 Support

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Respondent: East of England Development Agency (Mr Andrew Fisher) [8524] **Agent:** N/A

Full Text: EEDA welcomes the core strategy, particularly policy 5: The Economy, which recognises the facilitation of job growth, the role of enterprise hubs and a flagship food and farming hub. The recognition of the significance of Norwich as a key regional city within the East of England is in line with both the RES and RSS. The focus on places is positive and EEDA are happy to see that appropriate alignment between homes/jobs and the provision of essential services has been addressed. We are satisfied that the Submission document has appropriately reflected our previous comments to you

Summary: EEDA welcomes the core strategy, particularly policy 5: The Economy, which recognises the facilitation of job growth, the role of enterprise hubs and a flagship food and farming hub. The recognition of the significance of Norwich as a key regional city within the East of England is in line with both the RES and RSS. The focus on places is positive and EEDA are happy to see that appropriate alignment between homes/jobs and the provision of essential services has been addressed. We are satisfied that the Submission document has appropriately reflected our previous comments to you

Joint Core Strategy Proposed submission Document

S - 11256 - 8344 - 01Our Strategy - None

11256 Support

CHAPTER 1 01Our Strategy

Respondent: NHS Norfolk (Mrs Deborah Elliott) [8344]

Agent: N/A

Full Text: NHS Norfolk supports the soundness of the GNDP Joint Core Strategy and looks forward to continuing to work in partnership with the GNDP to 'design in health' for all new developments to promote healthy active lifestyles.

Summary: NHS Norfolk supports the soundness of the GNDP Joint Core Strategy and looks forward to continuing to work in partnership with the GNDP to 'design in health' for all new developments to promote healthy active lifestyles.

Joint Core Strategy Proposed submission Document

S - 11257 - 8532 - 01Our Strategy - None

11257 Support

CHAPTER 1 01Our Strategy

Respondent: Mr John Broadbent [8532]

Agent: N/A

Full Text:

Summary:

I just want to thank the four councils involved in this work. So far as I can tell it is of high intellectual quality; and I have the feeling that (at last!) many difficult differences have been hammered out, to produce a development strategy worthy of Greater Norwich. I have lived and worked in Norwich for only 40 years, though my family has had bases in the county for longer, and still has. So it is a great comfort to feel that this remarkable ancient rural city is now recognised, in its full neighbourly extent, and pointed to a sustainable future. I think your work on transport is particularly impressive and, of course, urgent.

Joint Core Strategy Proposed submission Document

S - 11258 - 951 - 01Our Strategy - None

11258 Support

CHAPTER 1 01Our Strategy

Respondent: Norfolk Ramblers Association (Mr Ray Walpole)
[951] **Agent:** N/A

Full Text:

Summary: I congratulate the Partnership on the soundness of its plan and its presentation. I think that the GNDDP would allay some public fears, aroused by "nimby lobbies", if it devised with the help of adult education (WEA) a conference to explain why more housing is needed here, regardless of government directives. The Partnership, with the help of the UEA, could then explain why/how Greater Norwich has developed in the past 60 years and will continue to do so. The EEDA consultation at the Forum demonstrated the need for the Partnership to educate the public in housing planning. Otherwise the nimby lobby will arouse so much public opposition that constructive discussion will be stifled by emotional opposition.

Joint Core Strategy Proposed submission Document

S - 11260 - 7444 - 01Our Strategy - None

11260 Support

CHAPTER 1 01Our Strategy

Respondent: Coal Authority (Miss Rachel Bust Planning and Local Authority Liaison) [7444] **Agent:** N/A

Full Text:

Summary: Thank you for consulting The Coal Authority on the above. Having reviewed your document, i can confirm that we have no specific comments to make on this document at this stage.

Joint Core Strategy Proposed submission Document

S - 11261 - 4401 - 01Our Strategy - None

11261 Support

CHAPTER 1 01Our Strategy

Respondent: Woodbastwick Parish Council (Mrs Pauline James) Agent: N/A
[4401]

Full Text:

Summary: Woodbastwick Parish Council supports the proposed submission document for the Joint Core Strategy.

Joint Core Strategy Proposed submission Document

S - 11262 - 4399 - 01Our Strategy - None

11262 Support

CHAPTER 1 01Our Strategy

Respondent: South Walsham Parish Council (Mrs P James) Agent: N/A
[4399]

Full Text:

Summary: South Walsham Parish Council supports the proposed submission document for the Joint Core Strategy.

Joint Core Strategy Proposed submission Document

S - 11263 - 4400 - 01Our Strategy - None

11263 Support

CHAPTER 1 01Our Strategy

Respondent: Upton with Fishley Parish Council (Mrs P James) Agent: N/A
[4400]

Full Text:

Summary: Upton with Fishley Parish Council supports the proposed submission document for the Joint Core Strategy.

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S - 11264 - 4398 - 01Our Strategy - None

11264 Support

CHAPTER 1 01Our Strategy

Respondent: Beighton Parish Council (Mrs Pauline James)
[4398] **Agent:** N/A

Full Text:

Summary: Beighton Parish Council supports the proposed submission document for the Joint Core Strategy.

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O - 11268 - 8109 - 01Our Strategy - ii

11268 Object

CHAPTER 1 01Our Strategy

Respondent: Ms R Pickering [8109]

Agent: N/A

Full Text:

Summary: Isn't it very important in the present and forthcoming economic climate to take no steps to which may be regenerated later? Very significant and unforeseen results may be encountered for some considerable time as the result of the recession. "New" spending surely must be only undertaken after very considerable thought. Money spent even on preparatory thought could well be recreated later if it is undertaken at the present time.

Joint Core Strategy Proposed submission Document

O - 11269 - 8555 - 01Our Strategy - i, ii, iii

11269 Object

CHAPTER 1 01Our Strategy

Respondent: Mr Roland Russell [8555]

Agent: N/A

Full Text:

Summary: 1. There is ample local facilities available already, with demand being easily supplied.2. It is not effective use of land when food prices are set to rise.3. Use of "brownfield" sites would, i would say, be in-line with Govt policy.

Joint Core Strategy Proposed submission Document

O - 11273 - 8120 - 01Our Strategy - i, ii

11273 Object

CHAPTER 1 01Our Strategy

Respondent: Mr E Newberry [8120]

Agent: N/A

Full Text:

Summary: Based on too many if's and but's. The road layout proposed at Postwick is against local Council's recommendations and can become an accident blackspot, this is just an example of not listening to local knowledge. Not enough emphasis on manufacturing industries. Losing to many jobs abroad.

Joint Core Strategy Proposed submission Document

S - 11276 - 2048 - 01Our Strategy - None

11276 Support

CHAPTER 1 01Our Strategy

Respondent: Seething Parish Council (Mrs A Garrod) [2048] **Agent:** N/A

Full Text:

Summary: Seething Parish Council finds the Joint Core Strategy for Broadland, Norwich and South Norfolk proposed submission document to be sound.

Joint Core Strategy Proposed submission Document

O - 11277 - 2024 - 01Our Strategy - None

11277 Object

CHAPTER 1 01Our Strategy

Respondent: Kirby Cane Parish Council (Mrs C Lester) [2024] Agent: N/A

Full Text:

Summary: Most of our Councillors are making their comments online, some of the comments they have made are; It is good to plan ahead but cannot find any safeguard for local democracy, it seems it will be all or nothing.

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O - 11278 - 1999 - 01Our Strategy - None

11278 Object

CHAPTER 1 01Our Strategy

Respondent: Ellingham Parish Council (Mrs C Lester) [1999] **Agent:** N/A

Full Text:

Summary: Most of our Councillors are making their comments know themselves online, some of the comments they have made are; It is good to plan ahead but cannot find any safeguard for local democracy, it seems it will be all or nothing.

Joint Core Strategy Proposed submission Document

O - 11299 - 8260 - 01Our Strategy - None

11299 Object

CHAPTER 1 01Our Strategy

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary:

Objective 9, to protect, manage, and enhance the natural, built and historic environment. As geodiversity lies at the base of all these environmental disciplines this is the obvious place to incorporate objectives for geodiversity protection and enhancement, but it is nowhere mentioned on the page. We request that geodiversity sustainability be included within Objective 9. (See PPS9)

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O - 11326 - 8570 - 01Our Strategy - i, ii, iii

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Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Summary Hethersett Land Ltd contends that the JCS is not legally compliant because it can be demonstrated that decisions on the spatial strategy have been made on the basis of achieving local political aspirations, including the delivery of new roads, rather than with regard to securing the objective of contributing to the achievement of sustainable development as required by Section 39 of the Planning and Compulsory Purchase Act. The GNDP's own evidence demonstrates that the JCS would, if able to be implemented, undermine the ability to deliver sustainable development in parts of South Norfolk, and in some cases would result in unsustainable development in poorly located and poorly served settlements. The JCS's spatial strategy as it relates to South Norfolk is flawed and would result in unsustainable patterns of development contrary to the Act's legal requirement. The spatial strategy that best contributes to the achievement of sustainable development in South Norfolk and therefore meets the legally compliance test, as evidenced by Sustainability Appraisal and other supporting material would have been an approach that focussed more growth in fewer settlements in South Norfolk. Main representation Hethersett Land Ltd contends that the JCS, perhaps in the "Grand Challenges" section should have explicitly acknowledged that the JCS has a legal requirement to contribute to achieving the objective of sustainable development as required by the Planning and Compulsory Purchase Act 2004, Sec 39. This is the "grand challenge" for all local development plan documents. It should have provided the context for the preparation of the entire JCS, including the Vision and Spatial Strategy.

Hethersett Land Ltd contends that this omission highlights the GNDP's failure to properly take account of the requirement to contribute to achieving the objective of sustainable development in making its decisions on the JCS, particularly the South Norfolk part of the spatial strategy. Hethersett Land Ltd contends therefore, that the Joint Core Strategy (JCS) is not legally compliant, for the following reason: The Planning & Compulsory Purchase Act 2004 (Section 39) legally requires that "...the body responsible for preparing Local Development Documents must exercise the function [of preparing Local Development Documents (LDDs)] with the objective of contributing to the achievement of sustainable development" (P&CPA, 2004. sec.39(2)). It also legally requires "...regard to be had to national policies and advice relevant to Local Development Documents (LDDs)" (P&CPA, 2004. sec.39(3)). Hethersett Land Ltd contends that the pre-submission version of the JCS fails this legal requirement because it can be demonstrated that the Greater Norwich Development Partnership (GNDP), including the constituent plan making authorities (LPAs) have made decisions on the JCS that have been based on achieving political goals rather than based on robust and credible evidence of the contribution that the JCS would have on the objective of achieving sustainable development or having regard to national planning policies and advice, particularly related to the location of development and reducing the need to travel. Hethersett Land Ltd refers to the first two paragraphs on page 9 of the JCS as evidence of the GNDP's failure to fully take into account the legal requirement for decisions on LDDs to be based on objective of contributing to sustainable development. It confirms that the GNDP has based its decisions on the JCS on the apparent preferences of local communities and local political aspirations to deliver such things as an A140 bypass, rather than on its own available robust and credible evidence demonstrating that an alternative spatial strategy would better achieve sustainable development. Furthermore, it is clear the GNDP has made its decisions on the JCS's spatial strategy in full knowledge of the implications it has in undermining the ability to achieve the objective of contributing to sustainable development and also with knowledge that alternative spatial strategies would better deliver sustainable development. The Sustainability Appraisal (SA), responses to consultations and other GNDP technical material has all been available to GNDP Members to support their decision making processes. Yet, despite the evidence that demonstrates the chosen spatial strategy is less sustainable than other options and in some cases would deliver 'unsustainable' development, and contrary to the recommendations of its own officers (at the preferred options stage in December 2008), the GNDP Members disregarded the implications and pursued a politically driven spatial strategy of growth dispersal in South Norfolk, knowing full well that there are significant soundness issues with the approach.

As an example of the GNDP's failure to ignore the Act's requirement for decisions to be made in light of contributing to the objective of sustainable development, the GNDP's own evidence in the SA states that "...[strategic] Growth in Long Stratton has the potential to be less sustainable" (page 39). It goes on to state "...it is more difficult to say whether the local level benefits associated with [strategic] growth outweigh the more strategic disbenefits..." (page 72). Also "...a question is raised as to whether the dispersed nature of growth in South Norfolk and the isolated nature of Long Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport" (page 143) and "...smaller growth locations in South Norfolk will struggle to bring forward the same level of local services and facilities that can be brought forward at the North East Norwich Growth Area" (page 144). In other words, the evidence demonstrates that the South Norfolk growth dispersal strategy does not fully contribute to achieving the objective of sustainable development and in some cases undermines it and would result in unsustainable development and that it is not the most appropriate strategy when considered against the alternatives. The GNDP officers recommended an alternative spatial strategy of focussing more growth at a smaller number of sustainable locations in

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South Norfolk, including Hethersett as the most sustainable strategy for the JCS. The officer's recommendation was based on the findings of technical evidence, result of consultations, national planning policy and advice, regional planning policy and knowledge of the more positive contribution that alternative strategies would have upon the objective of achieving sustainable development, as set out in the Sustainability Appraisal. However, this recommendation was not accepted by the GNDP Members and an alternative, demonstrably unsustainable (in South Norfolk's case) strategy proposed, which has been carried forward into the pre-submission version of the Core Strategy. The result is a Joint Core Strategy that fails to demonstrate that its implementation would contribute to achieving the objective of sustainable development, particularly at certain settlements in South Norfolk. In fact, the evidence underpinning the JCS, commissioned by the GNDP, including the Sustainability Appraisal which is a key tool in demonstrating the ability of LDDs to contribute to sustainable development, demonstrates that certain elements of the spatial strategy, particularly the growth dispersal strategy in South Norfolk would hinder the objective of achieving sustainable development and in some cases would do the opposite and result in unsustainable development.

Furthermore, elements of the JCS, relevant to growth dispersal in South Norfolk are contrary to National Planning guidance and advice on achieving sustainability development, particularly related to the location of development. The JCS proposes growth at relatively poorly served settlements in South Norfolk, where the only real viable transport option for the majority of residents will be the private motor car. This runs contrary to National policy aims to reduce the need to travel, particularly by the private motor car (PPS1, PPS3 and PPS13). For instance: PPS1: Delivering sustainable development PPS1, requires that Development Plans should ensure that sustainable development is pursued in an integrated manner. Paragraph 27 requires that (inter alia) (iii) sufficient land of a suitable quality in appropriate locations to meet the needs for housing and other uses, taking into account accessibility and sustainable transport needs, the provision of essential infrastructure...etc (v) improved access for all to jobs, health, education, shops and leisure and community facilities etc, is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, whilst recognising it may be more difficult in rural areas; (vii) Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. The GNDP's own evidence, particularly in the Sustainability Appraisal and Norfolk County Council Public Transport Unity, highlights the difficulties in achieving these requirements with a growth dispersal strategy in South Norfolk. The evidence also demonstrates that an alternative strategy of focussing growth on fewer locations, including Hethersett, would better achieve these requirements. PPS3: Housing PPS3 (paragraph 36) requires that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. Paragraph 38 requires that decisions on the location of development need to be made in light of the contribution to cutting carbon emissions by focussing new development in locations with good public transport accessibility and/or by means other than the private car. Also, the location of development should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services and the need to provide housing in rural areas to enhance or maintain their sustainability. The GNDP's own evidence, particularly in the Sustainability Appraisal and Norfolk County Council Public Transport Unity, highlights the difficulties in achieving these requirements with a growth dispersal strategy in South Norfolk. There is no evidence to demonstrate that the growth dispersal strategy will contribute to the sustainability of certain South Norfolk Settlements and in some cases, the Sustainability Appraisal and other evidence suggests that it could have the opposite affect. The evidence also demonstrates that an alternative strategy of focussing growth on fewer locations, including Hethersett, would better achieve these requirements. PPG13: Transport PPG13 includes a strategic objective to reduce the need to travel, especially by the car. It requires the consideration of the potential for changing overall travel patterns, for instance by improving sustainability of existing developments through a fully co-ordinated approach of allocations and transport movements. The approach for rural areas, requires growth to reflect local transport plan provision. Also, that in more remote areas in order to create sustainable patterns new housing needs to be linked to new employment opportunities. It is clear that the GNDP have sought to identify a number of villages in South Norfolk as "Service Villages" that would not normally meet the general accepted Service Village definition, in order to try and align with this approach. It is telling that elsewhere in Norfolk, the definition of Service Villages is different, in terms of the type and number of services and the number of defined Service Villages is much less. However, The GNDP's own evidence, particularly in the Sustainability Appraisal and Norfolk County Council Public Transport Unity, highlights the difficulties in achieving a sustainable transport pattern with a growth dispersal strategy in South Norfolk. Also, that the limited amount of growth does not justify step change improvements to public transport provision. The evidence also demonstrates that an alternative strategy of focussing growth on fewer locations, including Hethersett, would better achieve these requirements. PPS12: Local Spatial Planning Equally importantly, the JCS fails the PPS12 requirement for Core Strategies to reflect the most appropriate strategy after considering the reasonable alternatives. Conclusion Hethersett Land Ltd's contend that the test of legal compliance goes beyond section 20(5) of the 2004 Act as suggested in the GNDP's "Guidance Notes to Accompany the Representation For Development Plan Documents" that accompanies the JCS. The GNDP should not have implied that this is the only relevant section to this test, and to do so could be misleading. It should be left open for respondents to raise issues of legal compliance against other sections of the Act. Hethersett Land Ltd's contend Section 39(2-3) of the 2004 Act is also relevant to legal compliance considerations. It is Hethersett Land Ltd's opinion that the JCS is not legally compliant with this section of the Act, because it fails to properly reflect the stated requirement that decisions on local development documents must be made in light of securing the objective of contributing to the achievement of sustainable development. Hethersett Land Ltd suggests that the GNDP has made its decision on the JCS in full knowledge that the certain elements of the chosen spatial strategy, particularly in relation to the growth dispersal strategy in South Norfolk would not contribute to the objective of achieving sustainable development, and in some cases would result in unsustainable development, particularly at certain locations, such as locating strategic growth at Long Stratton as evidenced in the Sustainability Appraisal. Hethersett Land Ltd suggests that the GNDP has therefore ignored: * its own commissioned evidence, including the Sustainability Appraisal which

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highlights the negative impact that elements of the JCS's chosen spatial strategy has on the ability to achieve sustainable development; * other available evidence that demonstrates alternative strategies in South Norfolk would perform better in terms of achieving sustainable development, including the option of focusing growth at key sustainable locations, such as Hethersett; * the advice of its officers that have suggested sustainable development would better be achieved by adopting an alternative spatial strategy in South Norfolk; and * the response of technical consultees that also indicate an alternative strategy of focusing growth at a smaller number of key locations, including Hethersett would better achieve sustainable development. Furthermore, the GNDP has also ignored National planning advice and guidance and regional guidance concerning sustainable development, relevant to the location of development and the reduction of the need to travel, particularly by private motor car. In Hethersett Land Ltd's opinion, the GNDP's decisions on the JCS have been based mainly on achieving political aspirations and not upsetting certain local communities for political reasons, rather than based on the objective of contributing to the achievement of sustainable development. The GNDP's own evidence, the responses to consultations and recommendations by GNDP officers all indicate that an alternative strategy of focusing more growth at a smaller number of settlements, including Hethersett would better contribute to the objective of achieving sustainable development. These shortcomings and risks have been continually explained to the GNDP decision makers by both their own officers and respondents to consultations but continue to be ignored. This is a fundamental failure and has led to a unsound plan that fails the 2004 Act's legal requirements.[Please note, further to this representation on "legal compliance", Hethersett Land Ltd has submitted a series of "soundness" representation that also demonstrate the JCS's failure to fully contribute to the achievement of sustainable development, particularly at certain settlements in South Norfolk District. These representations although "soundness" representations under the 3 "soundness" tests, should also be considered relevant to the Planning Act's legal requirement to contribute to the achievement of sustainable development.]

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Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Summary Hethersett Land Ltd contends that the JCS is neither legally compliant or sound because it can be demonstrated that the GNDP's decisions on elements of the spatial strategy for South Norfolk have been made to achieve local political aspirations, rather than with regard to: * securing the objective of contributing to the achievement of sustainable development; * National and Regional policy and advice without proper reasoning; and * most importantly, its own evidence and officer advice that indicates that the alternative spatial strategy of focusing growth at a smaller number of key settlements, including Hethersett would better deliver sustainable development.

The GNDP's own evidence demonstrates that the GNDP's decisions would, if able to be implemented undermine the ability to deliver sustainable development in parts of South Norfolk, and in some cases would result in unsustainable development in poorly located and relatively poorly served settlements in South Norfolk. The GNDP Members appear to have ignored the demonstrably more sustainable alternative spatial strategy of focussing more growth at a smaller number of settlements in South Norfolk, including Hethersett for political reasons, rather than evidentially based reasons. Furthermore, The JCS's suggestion that the growth dispersal pattern reflects the preferences of local communities is also questioned given the results of the JCS Issues and Options consultation stage which indicates more support for the alternative growth focus approach, than the growth dispersal approach. Main representation The JCS fails the Justified soundness test, because it can be demonstrated that: * It is not founded on a robust and credible evidence base; * It has proposed growth at a number of new (Service Village) settlements in South Norfolk very late on in the process, without giving the opportunity for those local communities to provide any meaningful consultation responses on their opinion of growth, or the ability for service and utility providers to comment on the infrastructure needs and requirements at these locations. * It is not the most appropriate strategy when considered against the reasonable alternatives. The JCS fails the Effective soundness test, because it can be demonstrated that: * There is a lack of alignment between the objectives and the spatial strategy * The policies and objectives are internally inconsistent * The infrastructure implications of the strategy are not completely identified and it is therefore not clear who is going to deliver the infrastructure requirements * It does not take account of matters which are imposed by circumstance, notwithstanding the GNDP's views about matters. * It is not flexible enough to deal with changing circumstances. The JCS fails the National Policy soundness test, because it can be demonstrated that: * It contains proposals that are not consistent with national policy, without adequately explaining the local justification. Hethersett Land Ltd has made a series of representations that demonstrate why the JCS fails the legal compliance test and the soundness tests. This representation is concerned with the JCS's spatial strategy's failure against the Justified soundness tests and demonstrates the evidence that has led to this conclusion. In order to demonstrate the failure against the Justified soundness test it is useful to set out a chronology of events that led to the JCS's current spatial strategy: Chronology of Events September 2007 Stakeholder workshops where held to discuss key issues, including housing and the location and rationale for growth. November 2007 At this time, the approach was to focus growth at key locations. 11 potential locations around Norwich were identified by the GNDP for large scale essential growth. The reason being that it would: * Maximise efficient provision of infrastructure (including new secondary schools); * Provide high quality public transport; * Provide good links with strategic employment locations; and * Potential for continued growth beyond 2025. The GNDP's initial analysis suggested a pattern of growth centred on the urban extension of NE Norwich, a new county town in the Hethersett area and extensions to Wymondham. This was the GNDP officers' 'preferred option' based on the evidence available, and was presented to members of the GNDP LDF working group. The first full scale consultation on the JCS was issued as "The Issues and Options" document. April 2008 The responses to the Issues and Options consultation and initial sustainability appraisal were presented to GNDP members at the 21 April 2009 GNDP LDF Working Group. The 11 growth options were reduced to 5 options to deliver 24,000 homes. Hethersett appeared in 4 of the 5 options. The quantum of growth was suggested as at least 4,000 homes in options 1-3 and 2,000 homes in option 4. Hethersett had no growth in option 5. In options 5 the numbers were to be redistributed to a stand alone new settlement. Officers raised concerns about the delivery of infrastructure under the dispersal option (option 4); option 5 wouldn't deliver enough numbers and the new settlement had not been properly evidenced. Option 2, including 4000 homes at Hethersett was promoted by GNDP Officers as the preferred option for the JCS's spatial strategy. The Member Group raised a number of concerns including the particular locations for growth in South Norfolk and requested a further working group meeting.

May 2008 A further GNDP LDF working group meeting took place on the 24 May 2008. A further option, Option 6 was presented. It proposed no growth at Hethersett and distributed it to a new settlement (at Mangreen) and other locations in South Norfolk. June 2008 The LDF regulations were changed, and there was no longer need to identify preferred option. However, a further round of 'technical' consultation was proposed to enable the gathering of further evidence of delivery. The 6 options were refined to 3. Option 1 and 2 included 4,000 homes at Hethersett and Option 3 no homes

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at Hethersett and instead suggested 4,500 homes at Mangreen new settlement. July 2008The GNDP Policy Group of the 18 July 2008 agreed to the Technical consultation including the 3 growth options, which was subsequently endorsed by each District Council cabinets/executives. August 20083 growth distribution options to accommodate the 24,000 homes were put out for consultation to 'technical consultees' (August to November). Hethersett was identified in 2 of the 3 options for 4,000 homes and not included at all in option 3, which proposed growth at a completely new settlement, Mangreen and growth at Long Stratton primarily to deliver a new by-pass without public funding. September 2008GNDP recalculate JCS housing requirement to a 1st April 2008 base date. This results in a reduction in numbers from 24,000 to 21,000. Councillor Bills, the local member for Hethersett and Member of the South Norfolk Cabinet, and John Fuller, leader of South Norfolk Council and a member of the GNDP Policy Group, expressed in the local press, their concern about growth at Hethersett and Little Melton. These comments were made during the consultation process, and prior to any information being presented to Members on the responses to the technical consultation. Councillor Bills calls the GNDP officer's plans "madness", despite endorsement by the South Norfolk Council cabinet (EDP, 16 September 2008). It appears that South Norfolk Members had made up their minds about growth in advance of a full and proper consideration of the response of the technical consultation and before officer's recommended a way forward. December 2008The responses to technical consultation were considered by GNDP officers. Officers suggest that based on evidence, and the results of the technical consultation, that option 1, including 4000 homes at Hethersett should be the Favoured Option and propose this in their report to the 18 December GNDP Policy Group, of which John Fuller is a member. At the same time, John Fuller confirms in the press that he used his influence to 'persuade' officers to reconsider option the recommended option. South Norfolk Members formulate their own option, Option 2a. This took into account the revised housing target figures of 21,000. The numbers appear to automatically "come off" the Hethersett figure, which is reduced to 1,000 homes with no explanation, or evidence considering the impact of reducing the numbers on scheme viability. Neither was any evidence presented demonstrating a robust consideration of reductions of housing numbers in other locations. 18th December 2008At the 18th December meeting of the GNDP Policy Group, South Norfolk Members including John Fuller who had already expressed his lack of support for the Officer's recommended option (i.e. 4,000 at Hethersett) formally proposes Option 2a which reflected the reduction in housing need (i.e. 21,000 rather than 24,000). The result being a reduction from 4,000 to 1,000 homes at Hethersett and a suggestion of growth at Mangreen in the longer term. (Mangreen had been given support by John Fuller). The only evidence underpinning the change was that "it was a better fit with the existing settlement character and pattern of South Norfolk". January 2009PINS undertake a review of the JCS's evidence. The Inspector expresses concern at the lack of evidence underpinning Option 2a, and the lack of clear relationship to national and regional policy. The Inspector criticised the lack of information related to infrastructure delivery and suggested that there was very little evidence to support the option. February 2009The results of the PINS review are presented to the GNDP Policy Group on 19 February 2009. Following the Inspector's concerns a further option is proposed excluding Mangreen as a growth location. Option 2+ is put forward with 1,000 homes at Hethersett and growth distributed at other settlements in South Norfolk with no mention of growth at Mangreen. The sustainability appraisal is made available to Members. March to June 2009Option 2+ proceeds to public consultation. June to October 2009The representations are considered by GNDP and presented to Members. November 2009Option 2+ is published as final option, with a further 40 new growth settlements identified, predominantly in South Norfolk. CommentaryThe above chronology of events helps to explain the evolution of the spatial options and the GNDP's decision making process that led to the current JCS spatial strategy. Hethersett Land Ltd contends that the chronology of events helps to demonstrate that the growth dispersal approach in South Norfolk has been derived on the basis of political decisions, rather than on the basis of evidence, including the Sustainability Appraisal or officer recommendations. It also demonstrates that the change occurred relatively late on in the process and it is not until now that the full dispersal option, including the identification of 40 new Service Villages in South Norfolk capable of accommodating growth has come to light. It is apparent that the GNDP has had to try and 'retro fit' evidence to support the 'new' spatial strategy, following the Inspector's criticism of the lack of evidence underpinning the change to the original spatial strategy in her report on the evidence base in early 2009. However, none of the evidence gathered since the decision to change to spatial strategy for South Norfolk to one of growth dispersal would suggest that the original strategy of focussing growth in South Norfolk as proposed by officers and as underpinned by the Sustainability Appraisal was wrong. There is still very little substantive evidence underpinning the reasoning and deliverability of the South Norfolk growth dispersal strategy. Indeed, the evidence and Sustainability Appraisal and results of consultations still indicates the most appropriate spatial strategy would be one of focussing housing growth at a smaller number of locations in South Norfolk, including at Hethersett. It is concerning that the GNDP Members have made their decisions on the spatial strategy in light of this evidence, including the Sustainability Appraisal which confirms that it would not contribute to sustainable development in certain locations and in some cases would lead to unsustainable development. The GNDP's justification being that it reflects local community preferences. However, it can be demonstrated with evidence was not necessarily the case. The GNDP's officers have been aware of the shortcoming of the GNDP Members' decisions on the spatial strategy and repeatedly highlighted the risks of adopting a largely unsubstantiated growth dispersal strategy for South Norfolk. The latest warning was in September 2009, as the pre-submission version of the JCS was being progressed through the Councils' committee processes prior to its endorsement and publication for comment. The particular risks highlighted by Officers were related to the evidence base, the consideration of reasonable alternatives, deliverability and flexibility. Also, since the growth distribution strategy for South Norfolk was changed relatively late on in the process there is an outstanding question about the ability of infrastructure and service providers to accommodate the growth proposed in the strategy, since the infrastructure providers have not yet been able to comment on the new South Norfolk growth locations proposed by the spatial strategy. Neither have the views of the local communities in the 40 new Service Villages capable of accommodating growth been sought until now. Hethersett Land Ltd therefore suggests that the evidence presented in this representation is sufficient to demonstrate the JCS's failure against the Justified soundness test, particularly in relation to the JCS's evidence base, and it being the most appropriate strategy when considered against the

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reasonable alternatives. It is interesting to note that these are issues also acknowledged by the GNDP officers and presented to GNDP Members during the course of the JCS's preparation as potential soundness issues.

Furthermore, there is a question whether the chosen spatial strategy actually reflects the preferences expressed by local communities during the consultation stage of the JCS's production, as suggested at Page 9 of the JCS document. The GNDP's own evidence suggests something rather different. The response to the Issues and Options consultation (November - February 2008) is summarised in the "Issues and Options Report of the Consultation Responses (GNDP)". In respect of the locational principles and locations for growth (pages 15, 16 and 17). The Report suggests that: "The largest support, at 35%, was for the option of large scale urban extensions and a possible new settlement, against 31% in favour of dispersed growth in a large number of areas." Also, in terms of the Preferred locations for growth: "Within their own district, South Norfolk's own residents gave greatest preference to options in Long Stratton, Wymondham and the South-West Sector (Hethersett).....The analysis suggests that the top preferences for individual locations were the north east sector; south west sector (Hethersett) and Wymondham. 35% of respondents supported large scale urban extensions, including South Norfolk residents....Consequently, 53 % of respondents support a growth strategy concentrating on the North East, South West and Wymondham either alone or with one or more additional settlements....Some 24% of responses preferred an option with a more dispersed pattern of at least 10 locations".For Long Stratton, "...in the specific local survey undertaken by South Norfolk Council, residents of Long Stratton came out very marginally against major growth to support A140 improvements (a by-pass)."Given the above evidence, it would appear that the South Norfolk growth dispersal strategy is not necessarily derived from the opinions of the consultees. The evidence further helps to demonstrate that the derivation of the South Norfolk growth dispersal strategy was based on political decisions and the voices of a vocal minority, not necessarily the majority view of JCS respondents. Hethersett Land Ltd therefore contend that the JCS's also fails against the Justified soundness test, particularly in relation to the evidence that it is based on, and facts related to the response from consultation exercises. Hethersett Land Ltd contends that the JCS is not sound because it can be demonstrated with evidence that its objectives (JCS, Section 4.4) cannot be achieved by implementing the chosen spatial strategy and policies.

The GNDP's own evidence demonstrates that if implemented, the JCS's spatial strategy would undermine the ability to achieve a number of its stated objectives and in some cases would run completely contrary to the objectives and result in unsustainable development in poorly located and relatively poorly served settlements in South Norfolk. It is therefore internally inconsistent, and fails against the Effective soundness test (These soundness issues are covered in more detail in Hethersett Land Ltd's soundness representation on the JCS's objectives). Furthermore, elements of the JCS, relevant to growth dispersal in South Norfolk are contrary to National Planning guidance and advice on achieving sustainability development, particularly related to the location of development. The JCS proposes growth at relatively poorly served settlements in South Norfolk, where the only real viable transport option for the majority of residents will be the private motor car. This runs contrary to National policy aims to reduce the need to travel, particularly by the private motor car (PPS1, PPS3 and PPS13). For instance:PPS1: Delivering sustainable developmentPPS1, requires that Development Plans should ensure that sustainable development is pursued in an integrated manner. Paragraph 27 requires that (inter alia) (iii) sufficient land of a suitable quality in appropriate locations to meet the needs for housing and other uses. , taking into account accessibility and sustainable transport needs, the provision of essential infrastructure...etc (v) improved access for all to jobs, health, education, shops and leisure and community facilities etc, is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car, whilst recognising it may be more difficult in rural areas; (vii) Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development.The GNDP's own evidence, particularly in the Sustainability Appraisal and Norfolk County Council Public Transport Unity, highlights the difficulties in achieving these requirements with a growth dispersal strategy in South Norfolk. The evidence also demonstrates that an alternative strategy of focussing growth on fewer locations, including Hethersett, would better achieve these requirements.PPS3: HousingPPS3 (paragraph 36) requires that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. Paragraph 38 requires that decisions on the location of development need to be made in light of the contribution to cutting carbon emissions by focussing new development in locations with good public transport accessibility and/or by means other than the private car. Also, the location of development should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services and the need to provide housing in rural areas to enhance or maintain their sustainability. The GNDP's own evidence, particularly in the Sustainability Appraisal and Norfolk County Council Public Transport Unity, highlights the difficulties in achieving these requirements with a growth dispersal strategy in South Norfolk. There is no evidence to demonstrate that the growth dispersal strategy will contribute to the sustainability of certain South Norfolk Settlements and in some cases, the Sustainability Appraisal and other evidence suggests that it could have the opposite affect. The evidence also demonstrates that an alternative strategy of focussing growth on fewer locations, including Hethersett, would better achieve these requirements. PPG13: TransportPPG13 includes a strategic objective to reduce the need to travel, especially by the car. It requires the consideration of the potential for changing overall travel patterns, for instance by improving sustainability of existing developments through a fully co-ordinated approach of allocations and transport movements. The approach for rural areas, requires growth to reflect local transport plan provision. Also, that in more remote areas in order to create sustainable patterns new housing needs to be linked to new employment opportunities. It is clear that the GNDP have sought to identify a number of villages in South Norfolk as "Service Villages" that would not normally meet the general accepted Service Village definition, in order to try and align with this approach. It is telling that elsewhere in Norfolk, the definition of Service Villages is different, in terms of the type and number of services and the number of defined Service Villages is much less. However, The GNDP's own evidence, particularly in the Sustainability Appraisal and Norfolk County Council Public Transport Unity, highlights the difficulties in achieving a sustainable transport pattern with a growth dispersal strategy in

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O - 11328 - 8570 - 01Our Strategy - i, ii, iii

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South Norfolk. Also, that the limited amount of growth does not justify step change improvements to public transport provision. The evidence also demonstrates that an alternative strategy of focussing growth on fewer locations, including Hethersett, would better achieve these requirements. PPS12: Local Spatial Planning Equally importantly, the JCS fails the PPS12 requirement for Core Strategies to reflect the most appropriate strategy after considering the reasonable alternatives. Conclusion The JCS fails the Justified, Effective and National Policy soundness tests. It cannot be demonstrated with robust and credible evidence that the JCS's spatial strategy of growth dispersal in South Norfolk contributes to the objective of achieving sustainable development. It cannot be demonstrated that the JCS's objectives will be met through the implementation of the chosen Spatial Strategy. Neither can it be demonstrated with robust and credible evidence that it is the most appropriate strategy after considering the alternatives, including focussing growth at a smaller number of locations, including Hethersett. Neither can it be demonstrated with robust and credible evidence that it fully reflects the preferences of respondents made at the Issues and Options stage. It also cannot be demonstrated that there are sufficient local reasons for the JCS to run counter to National Policy, particularly related to sustainability and reducing the need to travel. Ultimately, there is a lack of evidence demonstrating that in its current form, the JCS is deliverable.

Joint Core Strategy Proposed submission Document

S - 11347 - 1781 - 01Our Strategy - None

11347 Support

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Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary: My Council has read and discussed this document and reached the conclusion that at this time there was nothing they wished to comment on.

Joint Core Strategy Proposed submission Document

S - 11351 - 2373 - 01Our Strategy - None

11351 Support

CHAPTER 1 01Our Strategy

Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary:

In relation to South Norfolk we support in principle the approach now proposed as this places less emphasis on major areas of growth and development, for which long lead times are needed to achieve delivery and relies more on a range of smaller sites to deliver the housing requirement. This is an approach that will help to address potential shortages in supply in the Policy Area in the earlier years of the plan period.

Joint Core Strategy Proposed submission Document

O - 11359 - 8047 - 01Our Strategy - i, iii

11359 Object

CHAPTER 1 01Our Strategy

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary: This document fails in a number of areas. There is no factual evidence to justify the housing figures that the Planners are working from, other than those handed down by the South-eastern Regional Quango, with no explanation as to what is meant by, inward immigration. Which National Policy are we to be consistent with? It has changed annually for the last ten years.

Joint Core Strategy Proposed submission Document

O - 11530 - 8597 - 01Our Strategy - i, iii

11530 Object

CHAPTER 1 01Our Strategy

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living contends that the JCS is not legally compliant because it can be demonstrated that decisions on the spatial strategy have been made on the basis of achieving local political aspirations, including the delivery of new roads, rather than with regard to securing the objectives of contributing to the achievement of sustainable development as required by Section 39 of the Planning and Compulsory Purchase Act. The GNDP's own evidence demonstrates that the JCS would, if able to be implemented, undermine the ability to deliver sustainable development, and in some cases would result in unsustainable development in poorly located and relatively poorly served settlements. Blue Living contends that the 'Grand Challenges' should have explicitly acknowledged that the JCS has a legal requirement to contribute to achieving the objectives of sustainable development as required by the Planning & Compulsory Purchase Act 2004 Sec 39. This is the 'grand challenge' for all local development documents. Blue Living contends that this omission highlights the GNDP's failure to properly take account of the requirement to contribute to achieving the objectives of sustainable development in making its decisions on the JCS. Blue Living contends therefore, that the Joint Core Strategy (JCS) is not legally compliant for the following reasons: The Planning and Compulsory Purchase Act 2004 (section 39) legally requires that '...the body responsible for preparing Local Development Documents must exercise the function [of preparing Local Development Documents (LDDs)] with the objective of contributing to the achievement of sustainable development' (P&CPA 2004 sec.39(2)). It also legally requires '...regard to be had to national policies and advice relevant to LDDs. Blue Living considers that the pre-submission version of the JCS should make reference to sustainability under the heading of Grand Challenges (page 6).

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O - 11569 - 8018 - 01Our Strategy - i

11569 Object

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Respondent: **Norwich Green Party (Mr Stephen Little) [8018]** Agent: **N/A**

Full Text:

Summary:

We believe the above soundness of the above Development Plan Document can be challenged on the following grounds:

1. There is a lack of evidence to demonstrate that:
 - i) the Northern Distributor Road (NDR) is a cost effective and well-located option to serve planned growth areas
 - ii) the NDR fulfils the Document's Objectives on Sustainability, Climate Change and Use of Natural Resources
- 1a The NDR is a road designed to distribute traffic and goods across the north of the city - feeding in to one major housing development (Rackheath triangle area) and 3 strategic employment areas - the airport, Rackheath Triangle and Broadland Business Parks.
- 1b The major housing areas can feed into these without the need for a dual carriageway, and people commuting from within the city are more likely to benefit from improved public transport links directly from the city centre and an orbital bus route. The Broadland Local Plan (Replacement) (2006) envisaged a more low-cost option of a single carriageway service road to link the Rackheath area with the Postwick hub and there is a lack of evidence to suggest why a dual carriageway, with its associated problems of permeability, would instead be a preferred solution. (The NDR is also not shown as a policy in the East of England Plan 2008).
- 1c The rest of the housing growth is in the south and south-west of the city 'The NDR only affects the North parts of the outer Ring road on terms of vehicle time and delay' which will render it ineffective for most of the major housing growth in the area - which will depend on well linked infrastructure and public transport. The objectives of the East of England Plan are to - locate developments so as to reduce the need to travel, effecting a major shift in travel away from car use towards public transport, walking and cycling. The linking of the planned developments mentioned above with a dual carriageway does nothing to achieve these goals.
- 1d The key diagram on page 29 of the proposed document illustrates well how poorly the NDR relates to new development, with most of its length from Rackheath to the Fakenham Road being only relevant to one growth employment area at the airport which has a planned expansion of 30 hectares (out of a total 175 hectares planned employment area expansion outside the city centre). The western end of the NDR does not link with any growth area.
- 1e Sustainability objectives are firmly embedded in much of the wording of the strategy. Under the heading 'The Grand Challenges' on page 6, the strategy states an aim to make a '...radical cut in carbon emissions, reducing reliance and costs of energy fuelled by carbon generating sources...' On p22 the Spatial Vision proposes that the use of global resources will be minimised and, on page 24, that there will be a reduced need for car use. Meanwhile, on page 26 Object 1 includes the aim of 'minimising contributors to climate change' and on page 27 Object 7 aims for a reduction in the need to travel, especially by private car, and the greater use of sustainable modes of transport.
- 1f By any objective criteria, it is difficult to see how the construction of a dual-carriageway is compatible with these aspirations. The Northern Distributor Road is likely to encourage car use and increase CO₂ output for the city, which will significantly hinder attempts to reduce emissions in line with national carbon budgets and the strategy's objectives. Indeed, the Major Scheme Business Case for the NDR envisaged a 57% increase in traffic emissions by 2071 and it has the 4th highest emissions of any local road scheme in England. The Business Case also envisaged 90% of commuters to new developments would use the car which directly contravenes the modal shift away from car use envisaged in PPG13.
- 1g Similarly, the argument in 5.44 that 'significant improvement to public transport, walking and cycling in Norwich can only be achieved with the road capacity released by the NDR' is a highly unusual one, as it seems clear that to invest the money that would have been spent on the NDR directly into public transport would have a far greater impact in reducing traffic levels. More particularly, the traffic model for the NDR shows the road contributing to an increase in traffic on the Wroxham Road which would be a key arterial route servicing new development. Similarly, the first route planned for an Bus Rapid Transit Route is the Dereham Road and yet the NDR does not link to this road. Indeed, traffic is likely to increase on the Dereham Road, along with the Fakenham Road and Sweet Briar Road, from NDR related traffic crossing the Wensum valley.
- 1h The cost of the NDR, together with the Postwick hub and 2 other related A47 interchanges, would on current estimates run to £190 million. Effectively, this would use up available regional transport funding for years. Meanwhile, completed delivery of sustainable transport measures in the Norwich area is not envisaged until 2025 with much of the details, dates of delivery and sources of funding still to be identified. This would mean that the road is far more likely to entrench car dependency and cause car-reliant patterns of development long before the effects of public transport improvements are felt.
- 1i Therefore, to disprove the argument that the construction of the NDR is not in contravention with sustainability objectives, an evidence base with thorough modelling of non-NDR alternative solutions would be necessary. Yet all the way through the process, the NDR has been treated by the GNPD as an assumption and the modelling of non-NDR alternatives has been reluctant and incomplete. The Department of Transport itself revealed its frustration with this approach in a letter, dated 15 September 2009, from John Dowie, Director, Regional & Local Transport Delivery, to Mike Jackson, Director of Environment, Transport and Development at Norfolk County Council. The letter states: 'Finally, before we would be in a position to consider Programme Entry there are two additional pieces of work which also need to be concluded: * My colleagues would like to discuss with your team further details of non-road alternatives that you have investigated before arriving at the preferred scheme. I know this has been raised on a number of occasions previously but we will require a fuller statement of the analysis you have undertaken than what currently appears within the Business Case. '1j Within the Core strategy, spatial planning objectives 8 and 9 concern access to the countryside and maintaining and enhancing biodiversity and the unique qualities of the area. Yet the impermeable nature of a dual carriageway would be a significant hindrance to countryside access and the road would create distinctly unattractive 'gateways' to the city (5.10 on page 37 states that the 'urban edge is particularly sensitive'). Large parts of the area to the north-east of the city are characterised as ancient woodlands or historic parks and gardens and are protected under existing policy ENV10. The proposed NDR directly borders one such area (to the West of Rackheath) and goes straight through another (Beeston

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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O - 11569 - 8018 - 01Our Strategy - i

11569 Object

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Park). All of this begs the question of just how protected these areas are. Policy 1 in the strategy also speaks of preserving the resilience of eco-systems and minimising the fragmentation of habitats. The NDR similarly seems to be in complete contravention of that aim

Joint Core Strategy Proposed submission Document

O - 11578 - 8018 - 01Our Strategy - ii

11578 Object

CHAPTER 1 01Our Strategy

Respondent: Norwich Green Party (Mr Stephen Little) [8018] **Agent:** N/A

Full Text:

Summary: 5. The strategy fails to adequately address flood risk:5a We consider that on public safety grounds there should be a minimum height of land on which normal housing development would be contemplated. The reason for this is essentially to avoid the risk, if dangerous climate change proceeds in the way that it may according to some recent forecasts this century, of people being flooded out of their homes at night / caught by surprise by floods in their homes. This minimum height would be between 5-10 metres above sea level and so would exclude the Deal Ground and Utilities sites. These should either be used for non-housing development or any housing development there should be flood-immune - e.g. housing on stilts, as is common in parts of the Netherlands - thus enabling the area to continue its current potentially valuable role of providing flood water run-off to protect the city.

Joint Core Strategy Proposed submission Document

S - 11604 - 7215 - 01Our Strategy - None

11604 Support

CHAPTER 1 01Our Strategy

Respondent: Postwick with Witton Parish Council (A R Woods) **Agent:** N/A
[7215]

Full Text:

Summary: General commentPostwick with Witton Parish Council have considered the above Joint Core Strategy for Broadland Norwich and South Norfolk and have no further comments to make.

Joint Core Strategy Proposed submission Document

O - 11610 - 1823 - 01Our Strategy - None

11610 Object

CHAPTER 1 01Our Strategy

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

The first issue concerns the way in which it has been developed and raises a question about legal compliance. There were originally a number of presentations by officers who have taken the lead in this process. The issues and options paper which followed this was already loaded in the direction of the outcome. There then followed a "technical consultation" with limited circulation. It did not come to full public consultation until March this year. It was then drafted and the associated questions were posed, in such a way, that the answers would justify the proposals. The consultation was flawed because the appendices claimed to be offering three options for growth to consultees but examination of these clearly shows that they are merely three variations on a single option. So there was no choice. This is particularly so regarding the section of this scheme which falls within the Broadland District Council area. Even this process was not well managed by the Greater Norwich Development Partnership. The consultation on such a major project yielded only 356 replies; the reporting of them contained factual inaccuracies and questions raised by consultees were not addressed. Among the more serious of these were the rationale and justification for the size of the development proposals and the infrastructure plans. A summary of the consultations shows how little support there was for a number of the Key issues (Appendix A). Perhaps the most disconcerting is that the final document now being submitted shows little evidence of any note being taken of the responses made during the consultation process. It appears to be a more clearly defined version of the consultation document. a) Too much reliance on the web, which is unwise and unreliable given the numbers of older residents who either do not possess or are unfamiliar with this technology. b) In the case of written comments it is considered inappropriate that they should have been summarised on the Broadland District Council web site, the Parish Council strongly believes that all comments should have been displayed as written by contributors, notwithstanding the fact the consultation portal contained statements to the effect that postal comments had been summarised, this lack of transparency was unacceptable. c) Also unhappy that Salhouse has been added at this late stage, leaving the village open to a greater number of potential developments.

Joint Core Strategy Proposed submission Document

S - 11619 - 8608 - 01Our Strategy - None

11619 Support

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Respondent: Civil Aviation Authority (K Riensema) [8608]

Agent: N/A

Full Text:

Summary: GeneralWhilst the CAA would not wish to comment on local development plans, where officially safeguarded aerodromes lies within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult the aerodrome operator(s)/licensee(s) directly.*further background information provided as attached*

Joint Core Strategy Proposed submission Document

O - 11620 - 8453 - 01Our Strategy - None

11620 Object

CHAPTER 1 01Our Strategy

Respondent: Mr Nick Swatman [8453]

Agent: N/A

Full Text:

Summary:

Dear All, With reference to your 'Joint Core Strategy' could you furnish me with some details on the proposals? It appears that you have forgotten the section on Public Transport? Only one paragraph and no mention on implementing a rapid transit system? Surely this should be a long term goal? If it is a matter of finance would perhaps a longer time scale make more sense? Perhaps scaling back on 'Joint Core Strategy' and saving instead for a 21st Century infrastructure rather than the usual hotchpotch of poor road improvements and spurious green projects, dressed up as transport improvements, but instead acting as expedient cost savings on a cohesive 'Project' which would provide for all the areas people? None of your strategy is sustainable. It relies on a continuous growth in population and economic growth in order to realise your own 'pet projects' and whims. Norfolk is a finite area. A tidal barrier across the Wash would make more sense, utilising potential land in the same manner as the Netherlands. But this would cut-across the Green Lobby. You are ham-strung by Norfolk's failure to provide economic opportunities and your own myopic vision of the possible. This proposal is lame and unimaginative.

Joint Core Strategy Proposed submission Document

O - 11621 - 8453 - 01Our Strategy - None

11621 Object

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Respondent: Mr Nick Swatman [8453]

Agent: N/A

Full Text:

Summary:

The compliance procedures which you have so faithfully forward represent only a small part of the composite documents provided heretofore by the D.O.T. Would it be possible to forward all relevant Statutory Instruments as it would appear I am at something of a disadvantage with out ALL necessary constitutional ordinance. Your reference to a credibility test does you credit - would further provisions be available in order to re-enlighten both pecuniary and fiscal alternatives in relation to the stasis exist-ant in the contemporaneous documentation?

Joint Core Strategy Proposed submission Document

S - 11645 - 4685 - 01Our Strategy - None

11645 Support

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Respondent: Mr Peter Adams [4685]

Agent: Tetlow King Planning (Ms Rachel Coles) [8611]

Full Text:

Summary:

We welcome the recognition that not only is the population of Norwich and surrounding areas increasing but it is also ageing (page 5). We also welcome the Councils reference to the challenges of meeting the requirements of different groups within Society (page 7). We are pleased that the Council includes specific reference to the Sustainable Community Strategies and that there is emphasis on opportunities for people of all ages. As the population ages there is an increasing need for Councils to plan for the current and future need for care and accommodation for older peoples needs. In 2007 the UK reached the tipping point where there were more people over the age of 60 than under the age of 16.

Joint Core Strategy Proposed submission Document

S - 11649 - 8366 - 01Our Strategy - None

11649 Support

CHAPTER 1 01Our Strategy

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached scanned in representations. The evidence base supports growth in the north east (paragraph 4, page 8) - the BLT agree with this. In addition, the BLT also supports the acknowledgement that in Broadland, the historical pattern of development lends itself to further expansion with new growth in the parishes of old Catton, Sprowston and Thorpe St Andrew (paragraph 5, page 10). In this regard, the BLT welcome the designation of the Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle (appendix 5 of the JCS).

Joint Core Strategy Proposed submission Document

O - 11710 - 8618 - 01Our Strategy - ii

11710 Object

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Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

This representation refers to the letter accompanying the published JCS Proposed Submission Document and the content contained therein setting out the pre-conditions necessary for a decision to be taken on whether or not to proceed to submission. In promoting these representations regard has been had to PPS12 and "Local Development Frameworks - Examining Development Plan Documents: Soundness Guidance" - published by The Planning Inspectorate August 2009 (2nd Edition). "The proposed Joint Core Strategy is fundamentally unsound as evidenced by the statement accompanying the publication of the Proposed Submission Document: "...please note that a decision on whether to proceed to submission will only be taken after consideration of representations received, and after confirmation that the Norwich Northern Distributor Road, as an integral part of the Norwich Area Transportation Strategy, has secured entry into the Regional Funding Programme, in order to give the necessary confidence in its delivery..." This proves beyond doubt that the GNDP has not considered any reasonable alternatives to the proposed preferred strategy which is entirely dependent for its delivery upon the funding of the Norwich Northern Distributor Road. Should the necessary funding not be given towards the provision of this road, it is clear that proposed strategic growth locations cannot be delivered and there is no reasonable alternative in place with which to deliver the necessary growth in both housing and employment required within the Greater Norwich area within the timescales set by the East of England Plan. In this respect alone, the JCS cannot be in general conformity with that plan. In such circumstances there is no "Plan B", acknowledged in the Soundness Self Assessment. There is nothing contained within the Proposed Submission document to indicate what planning framework will exist in the event that submission does not take place.

Joint Core Strategy Proposed submission Document

O - 11711 - 8618 - 01Our Strategy - i, ii

11711 Object

CHAPTER 1 01Our Strategy

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

01 - Our Strategy Given our concerns about the overall approach to the adopted strategy, it is clear that the approach taken by the GNDP has been to select proposed growth options on the basis of attempting to justify long held aspirations for the achievement of particular road schemes. This is evident in the case of the proposals for north-east Norwich and at Long Stratton. Long Stratton In the case of Long Stratton it is noticeable that its status in the settlement hierarchy DPD is only as a Key Service Centre, yet it is proposed to allocate 1,800 houses in an attempt to justify a by-pass, a requirement to help resolve an existing issue, not a requirement for new growth. The GNDP considers that the allocation of 1,800 houses will pay for this road as well as contribute towards the enhanced provision of other facilities, including education, within the settlement. There appears to be local division over the extent to which additional development should occur to pay for this road but it is clear that the GNDP has not worked out whether or not the scheme is viable, or whether it can be achieved within a reasonable timescale. Furthermore, without dedicated public transport provision, involving additional expense to resolve problems at the A47/A140 junction, it is unclear whether the proposals are affordable even in the longer term. As a result increased commuting by car will inevitably take place. Without the desire to build this road it is evident that Long Stratton would not engender the level of development proposed given its status as a Key Service Centre. Long Stratton does not possess a wide range of retail provision. With the exception of the recently redeveloped garage site, now housing the Co-operative Supermarket, the settlement accommodates mainly hair salons and hot food takeaways and has limited, if any, room to expand its retail offer. With regard to employment opportunities, the largest employer is the local authority, South Norfolk Council. The extent to which employees travel to Long Stratton from other areas, by car, has not been measured, and it is unclear whether enhanced public transport provision would be cost effective on the back of any travel plan by the Council which might help to justify its provision. Such evidence is absent from the DPD proposals. If Long Stratton is regarded as having greater independence from the city of Norwich then it is questionable whether it should be included within the Norwich Policy Area, where the bulk of new development, it is intended, should be located. North East Norwich The proposals to locate significant growth at Rackheath and the so called "Growth Triangle" appear to depend entirely upon the provision of the Norwich Northern Distributor Road. If this road does not receive Government funding, it is questionable whether the DPD will be submitted to the Secretary of State. This dependency is paramount, it would seem, yet part of the reason for its requirement is predicated upon the fact that there is no spare road capacity to the north of Norwich in which to establish BRT or any alternative enhanced public transport provision. The main reason development was first promoted at Rackheath, irrespective of its recently achieved "Eco-Town status", was because it required the NDR, and it is noted that Broadland Council state development will be supported in this location irrespective of whether the Eco-Town designation remains. Delivery of development here is therefore road dependent and without it will be difficult to deliver without adding significant congestion to the present network. Whether or not the "Eco Town" can deliver the strict requirements to belie its status, especially in the area of job creation for example, remains to be seen.

Joint Core Strategy Proposed submission Document

O - 11182 - 6883 - 02 Introduction - i

11182 Object

CHAPTER 2 02 Introduction

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "The JCS cannot be delivered without the implementation of the Norwich Area Transportation Strategy including the Northern Distributor Road."Simply not true - the cycling and walking improvements can, and should, be delivered anyway.

Summary: "The JCS cannot be delivered without the implementation of the Norwich Area Transportation Strategy including the Northern Distributor Road."Simply not true - the cycling and walking improvements can, and should, be delivered anyway.

Joint Core Strategy Proposed submission Document

O - 11316 - 6826 - 02 Introduction - i

11316 Object

CHAPTER 2 02 Introduction

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

The statement is made that 'The JCS cannot be delivered without the implementation of the Norwich Area Transportation Strategy including the Northern Distributor Road'. CPRE consider that it would be more accurate to say that the Joint Core Strategy (JCS) was devised to justify the Northern Distributor Road (NDR) and certainly as regards a 'growth triangle' and associated development in the north east sector. We make two further points. Firstly, the 'updated' Norwich Area Transportation Strategy (NATS) is essentially the original document written in 2004, with the only up-dating appearing to be the replacement of a full bypass route with a three-quarter route in September 2005. Secondly, the Transport for Norwich consultation which ended on the 27th November made no attempt to update the NATS and included the statement (page 12 of the consultation booklet) that 'the NDR is the key piece of major infrastructure required to enable the implementation of the agreed NATS'. We ask in what way is this NATS4 'agreed', and by who. At the time the consultation opened the Department of Transport were awaiting further information to satisfy them on programme entry requirements, and had been for many months. It was a risk to proceed with this JCS consultation, which ends about the same time as the decision on programme entry of the NDR is expected to be made. If the decision is made against programme entry then the whole spatial strategy needs to be re-considered; and if the decision is further delayed, then the JCS process must be delayed until it is resolved.

Joint Core Strategy Proposed submission Document

O - 11317 - 6826 - 02 Introduction - i

11317 Object

CHAPTER 2 02 Introduction

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

In taking the JCS to 2026, this pre-empts the outcome of the review of the Regional Spatial Strategy (RSS) to 2031 and is not due for completion until 2011. It is stated that this review 'may result in upward pressure on housing targets but at this stage cannot be assessed with certainty' and 'the JCS may require early review to deal with changes to growth rate specified in the revised East of England Plan'. The case for an extension to 2026 relies on an interpretation of PPS 3 and the forward provision of land supply. We argue that the last five year period asks for an assurance that this can be done, rather than firm allocations of land that have to be made 15 years ahead. The JCS is clearly working on the assumption that housing provision will be maintained at current RSS levels, or be higher. If this were to be the case, then in a pragmatic view, the pre-emption would do no harm. However, if the Review decides on a lower rate of build for the period 2011 to 2031, then even an 'early review' of a JCS would not be able to address the problems created. An over-allocation of land supply to 2026 would result in cherry-picking of sites by developers, not just on location, but perhaps on size. In particular it would see a lowered utilisation of previously developed land in Norwich, and a set pattern of 'greenfield first' for many years. Also the size of sites/numbers of houses selected might be minimised in terms of section 106 commitments. It would also create difficulties for 'master planning' for the provision of hard and soft infrastructure priorities and timescale to provision. The RSS Review consultation which ended on the 24th November presented four scenarios for housing and economic growth, of which the lowest of the four was a continuing RSS level, a 'roll-over'. Both Norfolk County Council and CPRE Norfolk argued that a lower growth scenario should have been included, albeit with some differences in reason and emphasis. CPRE East of England made a representation for a lower scenario, and it is likely that other Norfolk local authorities did as well.

Joint Core Strategy Proposed submission Document

O - 11396 - 7172 - 02 Introduction - i, ii, iii

11396 Object

CHAPTER 2 02 Introduction

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary: Introduction - Section 2NNTAG disagrees that the JCS is dependent on the implementation of a NDR. Although the Soundness Self-Assessment report claims that 'There is no plan B to build in flexibility over the key infrastructure', this is not based on evidence as the GNDP deliberately assumed a NDR and failed to test other alternatives.

Joint Core Strategy Proposed submission Document

O - 11697 - 5316 - 02 Introduction - i

11697 Object

CHAPTER 2 02 Introduction

Respondent: M Sida [5316]

Agent: N/A

Full Text:

Summary:

Using the same ratio on a pro-rate basis of the "relatively rapid growth" period, then between 2008 and 2026, the population can be expected to increase by around 60,000 (between 2001 & 2007; ie; 6 years by 20,000, hence between 2008 & 2026; ie; 18 years, by 60,000). In the "East of England Plan" with respect to the Greater Norwich Sub-Area - part 1, para 3.2. This equates to about 2.3 person per dwelling and hence with an increase in population of 60,000, it indicates that between 2008 and 2026, around 26,100 additional dwellings will be required not at least 36,740 as stated in Para 2.8. This difference of 10,600 in the projected requirement of dwellings is fundamental to the GNDP, JCS. Fundamental in areas such as the Growth Infrastructure Needs and perhaps most importantly the amount of funding. In the "East of England Plan", Greater Norwich Sub Area - part 1 para 3.5 under the heading of Population and economic change it does not state that, if recent trends continue, the area's population will be 468,000 by 2031 (ie: an increase of around 96,000). If the pro-rata basis used above (ie: 20000 in 6 years of "relatively rapid growth") the population would increase by around 76,000 by 2031. Para 3.5 of the EEP does however qualify the 468,000 figure by highlighting that the increase is based on 20% due to natural change and 80% of people moving into the area. The 20% assessment is more finite in the sense that it is based on overall trends and statistics in ageing and births of the population as a whole. The 80% assessment although having a greater influence on the overall population figure is more spurious. For the reasons set out above, I consider that the number of new homes that will be built stated in para 2.8 is unsound and not justified on the basis of overall assessment of the likely increase in population and this in turn has an overall "roll-on" affect on other major aspects of the JCS (e.g.; creation of new jobs, growth of infrastructure etc.)

Joint Core Strategy Proposed submission Document

S - 11183 - 6883 - 03 Spatial Portrait - None

11183 Support

CHAPTER 3 03 Spatial Portrait

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: 3.12 basically says that extra car journeys occur because of building of Longwater employment area, Broadland Business Park etc. I agree that this is the cause of the extra traffic. However, it should be noted (and added to the wording) that this has been due to bad planning decisions in the past. Out of town developments exclude those without a car (still a significant minority of Norwich residents) and should not be built or expanded without proper public transport / cycling provision, e.g. a rail link and cycle routes to Broadland Business Park.

Summary: 3.12 basically says that extra car journeys occur because of building of Longwater employment area, Broadland Business Park etc. I agree that this is the cause of the extra traffic. However, it should be noted (and added to the wording) that this has been due to bad planning decisions in the past. Out of town developments exclude those without a car (still a significant minority of Norwich residents) and should not be built or expanded without proper public transport / cycling provision, e.g. a rail link and cycle routes to Broadland Business Park.

Joint Core Strategy Proposed submission Document

O - 11184 - 6883 - 03 Spatial Portrait - i

11184 Object

CHAPTER 3 03 Spatial Portrait

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: 3.13 says that the NDR will remove 19,000 cross city trips. While this may be true, many extra car trips, including in the city, will be generated by the new road, so the net effect will be to increase traffic and carbon emissions in the Norwich area.

Summary: 3.13 says that the NDR will remove 19,000 cross city trips. While this may be true, many extra car trips, including in the city, will be generated by the new road, so the net effect will be to increase traffic and carbon emissions in the Norwich area.

Joint Core Strategy Proposed submission Document

O - 11233 - 8540 - 03 Spatial Portrait - i

11233 Object

CHAPTER 3 03 Spatial Portrait

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: Accept that employment in farming and manufacturing has declined, but the food and farming industries remain as significant industries in relation to the Norfolk and Norwich economies in terms of research and Gross Value Added (GVA)

Summary: Accept that employment in farming and manufacturing has declined, but the food and farming industries remain as significant industries in relation to the Norfolk and Norwich economies in terms of research and Gross Value Added (GVA)

Joint Core Strategy Proposed submission Document

O - 11298 - 8260 - 03 Spatial Portrait - None

11298 Object

CHAPTER 3 03 Spatial Portrait

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary: The natural environment now has a more coherent place within the document , but the actual status accorded to the natural world, and the background information provided about it, is still minimal given the expected scale of impact from the development plans outlined within the strategy. In particular, section 03 the Spatial portrait compresses all the natural world information into a single paragraph, 3.3 and still makes no mention of geodiversity.

Joint Core Strategy Proposed submission Document

O - 11330 - 8570 - 03 Spatial Portrait - i

11330 Object

CHAPTER 3 03 Spatial Portrait

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: The JCS's spatial portrait provides the context for the JCS's spatial vision and spatial strategy. However, Hethersett Land Ltd suggests that it includes some inaccuracies that impact upon the rest of the strategy. Hethersett Land Ltd therefore suggests that the JCS fails the Justified soundness test, because it can be demonstrated that: "It is not founded on a robust and credible evidence base, or backed up with facts; Main representation Public Transport Services Hethersett Land Ltd note that the Joint Core Strategy's Spatial Portrait (para 3.11) suggests that public transport facilities in the area are "generally good". Hethersett Land Ltd acknowledge that in the urban area, the main towns and key service centres bus services are generally adequate and bus services run to many of the main service centres. However, Hethersett Land Ltd contend that in some of the other suggested Service Villages, particularly some of the new Service Villages proposed in South Norfolk District, the public transport services could not be described as "generally good" and are rather more limited in terms of frequency and destinations. Hethersett Land Ltd notes that in the settlement hierarchy assessment, a settlement can get a "score" for its public transport service, irrespective of destination, frequency and length of journey. However, for some of the settlements suggested as "Service Villages", it is clear that the bus service is going to be unviable for all but a few of the new residents, and the most likely travel option will inevitably be the car, particularly given the lack of jobs, services and facilities at some of the new Service Villages. This point should have been acknowledged in the Spatial Portrait. Hethersett Land Ltd contends that it was not, because it would undermine the chosen South Norfolk growth dispersal strategy. This lack of robust and credible evidence is a weakness and further demonstrates why the JCS fails the Justified soundness test. Hethersett Land Ltd find it surprising that in light of the evidence and the limited public transport services in many of the Service Villages, that the South Norfolk growth dispersal strategy has been proposed. With all the will in the world, it is hard to see how by putting growth in a large number of settlements with limited public transport services that the JCS's stated ambitions to reduce travel by private motor car will be met and how congestion in Norwich can be controlled. In Hethersett Land Ltd's opinion the strategy of putting more growth in village locations with limited bus services is only going to make matters worse. Growth in the A11 Corridor Hethersett Land Ltd notes that the JCS Spatial Portrait purports to propose significant growth on the A11 corridor. It provides examples of significant growth on the A11 corridor in Breckland i.e. 10,000 homes out of an overall dwelling target of 11,740 for the period 2001-2021 (East of England Plan) = 85%. However for the JCS, the A11 corridor provides for around 4,400 homes at Wymondham, Hethersett and Cringleford out of a residual 30,000 homes for Norwich, Broadland and South Norfolk. This is only 14%. It is therefore questionable that the JCS actually proposes "significant growth" in the A11 corridor, when compared to the level of growth in Breckland or the overall JCS growth target. This lack of robust and credible evidence justifying this statement is a weakness in the JCS and further demonstrates why the JCS fails the Justified test. The JCS spatial strategy actually seeks to spread growth along the A140 and A47 (i.e. Long Stratton, Diss, Easton, Costessey, Acle and other locations) and other villages in the South Norfolk area. The JCS acknowledges the A140 is an almost an entirely single carriageway route, subject to speed restrictions, and the A47 is mostly single carriageway and suffers congestion and safety issues. Yet growth is proposed along their routes. Hethersett Land Ltd questions the sense in proposing growth along these corridors, particularly given the likely capacity issues and lack of investment. Other than perhaps the Postwick junction on the A47, there is little prospect of major publicly funded capacity improvement schemes for either of these 2 routes in Norfolk. Hethersett Land Ltd suggests that the A47 and A140 corridors are less suitable and less able to accommodate growth. Neither do they feature highly in the regional or local investment programmes. They are also routes less well served by public transport. For instance Long Stratton does not have a railway station, and there is no railway service to the west of Norwich. Hethersett Land Ltd suggests that the A47 and A140 have been identified as growth corridors, in order that the JCS's Spatial Strategy can artificially limit the scale of growth in the A11 strategic corridor; even though the available evidence would suggest that the corridor has the capacity to accommodate more growth than that proposed in the JCS. Also, that the decision to limit growth in the A11 Strategic corridor ignores the fact that A11 corridor is the acknowledged as a "growth corridor" in the East of England Plan. The East of England Plan acknowledges the A11 corridor as the main focus of transport infrastructure funding in Norfolk, and provides the best options for public transport provision. Relocating growth away from this corridor ignores its designation and limits the amount of private sector funding that could contribute towards improvements and upgrades. The strategy of dispersal away from the A11 corridor to other locations, would still require substantial investment in infrastructure including the Longwater junction, A47/A140 Harford bridge junction, A47 Postwick junction, A11/A47 Thickethorn junction and Long Stratton bypass. However, it is not clear whether this level of transport investment can be delivered through the level of growth proposed in the new "growth corridors". Hethersett Land Ltd suggest that the best way of securing investment is through focussing growth in a smaller number of locations, clearly related to existing infrastructure capacity and where there is a reasonable prospect to increase infrastructure capacity. This is the entire philosophy of the A11 strategic growth corridor. It is known what investment is needed to provide the capacity to accommodate growth, investment decisions are focussed on this corridor, and the ability to 'capture' uplifts in land value to help fund infrastructure is more certain as the linkages between development

Joint Core Strategy Proposed submission Document

O - 11330 - 8570 - 03 Spatial Portrait - i

11330 Object

CHAPTER 3 03 Spatial Portrait

and infrastructure can be demonstrated. The South Norfolk approach of dispersing growth away from the A11 corridor dilutes this philosophy to the extent that it may fail to deliver the funding required to support the infrastructure needs. Conclusion The Spatial Portrait is not a true reflection of the local context, particularly as it relates to public service provision in the rural area. It also overplays the importance of the A140 corridor, and to some extent the A47 corridor. It suggests significant growth is proposed at East Dereham in Breckland District, which is inaccurate when compared to the levels of growth in Thetford and Attleborough also in Breckland District. It also suggests that the JCS proposes significant growth in the A11 corridor, which too is somewhat of an exaggeration when compared to the level of growth in the Breckland District part of the A11 corridor and in the context of the overall growth figures for the Greater Norwich Area. These inaccuracies and exaggerations help to highlight the fact that there are inconsistencies and weaknesses in the evidence base as it relates to the South Norfolk growth dispersal strategy.

Joint Core Strategy Proposed submission Document

O - 11397 - 8576 - 03 Spatial Portrait - i

11397 Object

CHAPTER 3 03 Spatial Portrait

Respondent: Mr Richard Albert Harris [8576]

Agent: N/A

Full Text:

Summary: Development Plan making use of farm land is unsound policy

Joint Core Strategy Proposed submission Document

O - 11403 - 905 - 03 Spatial Portrait - iii

11403 Object

CHAPTER 3 03 Spatial Portrait

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Paragraph 3.4, page 16 These assests are just not important to present day residents and visitors and we would like this point to be made within the paragraph

Joint Core Strategy Proposed submission Document

O - 11471 - 934 - 03 Spatial Portrait - i

11471 Object

CHAPTER 3 03 Spatial Portrait

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

We would take issue with the claim that the area has only two assets of international importance . Although the Broads sit just outside GNDP's boundary, the internationally designated River Wensum SAC extends into the Greater Norwich administrative area, so we believe that the natural environment should be added to the list of assets of international importance (page 15).We welcome the recognition that 'Wildlife habitats of national or local importance are found in the urban area as well as the countryside' (ibid), and would urge the GNDP to take all necessary measures to conserve and enhance these habitats while supporting the proposed linkages between urban and rural set out in their green infrastructure master-planning documents.

Joint Core Strategy Proposed submission Document

O - 11494 - 8589 - 03 Spatial Portrait - None

11494 Object

CHAPTER 3 03 Spatial Portrait

Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary:

I would like to submit the following observations as a contribution to the response to the Joint Core Strategy. I recognise that this is not a second consultation but is intended to establish the soundness of the document. It is clear that it does not have a sound base and this contribution gives the main reasons for this conclusion. This document should not be adopted without further review because it contains flaws in the strategic arguments. The first issue concerns the way in which it has been developed and raises a question about legal compliance. The establishment of the Greater Norwich Development Partnership (GNDP) as a vehicle to prepare this strategy has removed the accountability from the individual Councils and resulted in decisions being taken which will have a profound impact on residents. However, this process has at the same time removed the decision making to a level where none of the organisations have due competence. It has also created a democratic deficit since there is no way in which the wishes of residents can be adequately safeguarded against choices made by people and organisations who have no electoral mandate. The issues and options paper prepared by the GNDP in 2008 was already loaded in the direction of the outcome whilst being necessarily lacking in the detail to which substantive comments could be addressed. There then followed a "technical consultation" with limited circulation. The questions asked included a query about the need for significant infrastructure requirements; whether the consultees supported the favoured option; and what opportunities this favoured option presents. Even at this stage in the process, it became clear that a decision had been taken which effectively rendered the public consultation process redundant. When asked whether they supported this favoured option, more organisations objected to this favoured option than were in support. This was not placed in the public domain so it is difficult to see what influence on the strategic development this part of the process served, except to close out all other options. The Joint Core Strategy did not come out to full public consultation until March this year. That consultation was flawed. The appendices claimed to be offering three options for growth to consultees. However, examination of these clearly shows that they are merely three variations on a single option. So there was no choice. This is particularly so regarding the major section of this scheme for 10 - 12,000 houses which falls within the Broadland District Council area. Even this process was not well managed by the Greater Norwich Development Partnership. The consultation on such a major project yielded only 356 replies; the reporting of them contained factual inaccuracies and questions raised by consultees have not been addressed. Among the more serious of these were the rationale and justification for the size of the development proposals and the infrastructure plans. A summary of the consultations shows how little support there was for a number of the Key issues (Appendix A). Examination of these responses also shows that they have been edited to present a more favourable case. It highlights the fact that the so-called technical responses have not been disclosed nor were included in the consultation document. Perhaps the most disconcerting is that the final document now being submitted shows little evidence of any note being taken of any responses made during the consultation process.

Joint Core Strategy Proposed submission Document

O - 11185 - 6883 - 04 Spatial Vision and Spatial Vision objectives - i

11185 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "People will have access to good quality jobs and essential services and community facilities, with less need touse the car." But the NDR will INCREASE car use. Also the NDR will sever useful cycling links - St. Fath's Lane and Smeee Lane.

Summary: "People will have access to good quality jobs and essential services and community facilities, with less need touse the car." But the NDR will INCREASE car use. Also the NDR will sever useful cycling links - St. Fath's Lane and Smeee Lane.

Joint Core Strategy Proposed submission Document

O - 11186 - 6883 - 04 Spatial Vision and Spatial Vision objectives - i

11186 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "The NDR will enable significantly enhanced public transport, cycling and walking networks."Not true.St. Fath's Lane and Smee Lane, currently useful cycle routes, will be closed off. Spending money on the NDR will take resources away from other transport initiatives, create extra suburban sprawl and generate extra traffic.

Summary: "The NDR will enable significantly enhanced public transport, cycling and walking networks."Not true.St. Fath's Lane and Smee Lane, currently useful cycle routes, will be closed off. Spending money on the NDR will take resources away from other transport initiatives, create extra suburban sprawl and generate extra traffic.

Joint Core Strategy Proposed submission Document

S - 11187 - 6883 - 04 Spatial Vision and Spatial Vision objectives - None

11187 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "sustainable transport options will include a network of safe and convenient pedestrian and cycle links and public transport services to provide easy access between residential areas, the city centre, business parks, local services and further afield, reducing the need for car use" I support this but it doesn't fit with what has happened so far. For example, Broadland Business Park has been built without a rail link or cycle routes from the city centre, and the same looks likely with Broadland Gate Business Park.

Summary: "sustainable transport options will include a network of safe and convenient pedestrian and cycle links and public transport services to provide easy access between residential areas, the city centre, business parks, local services and further afield, reducing the need for car use" I support this but it doesn't fit with what has happened so far. For example, Broadland Business Park has been built without a rail link or cycle routes from the city centre, and the same looks likely with Broadland Gate Business Park.

Joint Core Strategy Proposed submission Document

S - 11188 - 6883 - 04 Spatial Vision and Spatial Vision objectives - None

11188 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "Objective 1 - To minimise the contributors to climate change and address its impact" In total agreement, but support of NDR elsewhere in document is in contradiction to this!

Summary: "Objective 1 - To minimise the contributors to climate change and address its impact" In total agreement, but support of NDR elsewhere in document is in contradiction to this!

Joint Core Strategy Proposed submission Document

S - 11189 - 6883 - 04 Spatial Vision and Spatial Vision objectives - None

11189 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "Objective 4 - To promote regeneration and reduce deprivation" In agreement but building out of town business parks and shopping centres has been in direct conflict with this policy and has left empty offices and shops in the city centre, as well as killing off small specialist shops. e.g. Aviva move to Broadland Business Park, Longwater supermarkets. This has led directly to deprivation in Norwich.

Summary: "Objective 4 - To promote regeneration and reduce deprivation" In agreement but building out of town business parks and shopping centres has been in direct conflict with this policy and has left empty offices and shops in the city centre, as well as killing off small specialist shops. e.g. Aviva move to Broadland Business Park, Longwater supermarkets. This has led directly to deprivation in Norwich.

Joint Core Strategy Proposed submission Document

S - 11190 - 6883 - 04 Spatial Vision and Spatial Vision objectives - None

11190 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "Objective 12 - To involve as many people as possible in new planning policy"Totally support, but this would not fit with previous experiences. e.g. Objected to plans for Broadland Gate Business Park, where maps for area possible to cycle from was shown incorrectly. Plans were revised but inaccuracies weren't taken into account. You begin to feel "what's the point in bothering?"

Summary: "Objective 12 - To involve as many people as possible in new planning policy"Totally support, but this would not fit with previous experiences. e.g. Objected to plans for Broadland Gate Business Park, where maps for area possible to cycle from was shown incorrectly. Plans were revised but inaccuracies weren't taken into account. You begin to feel "what's the point in bothering?"

Joint Core Strategy Proposed submission Document

S - 11210 - 8484 - 04 Spatial Vision and Spatial Vision objectives - None

11210 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Marks & Spencer Plc [8484]

Agent: Nathaniel Lichfield and Partners (Miss Catherine Widdowson) [8483]

Full Text: M&S supports objective 6 and the requirement that the diversity, vitality and accessibility of the city centre will be maintained and enhanced.

Summary: M&S supports objective 6 and the requirement that the diversity, vitality and accessibility of the city centre will be maintained and enhanced.

Joint Core Strategy Proposed submission Document

O - 11218 - 8542 - 04 Spatial Vision and Spatial Vision objectives - i, ii, iii

11218 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: The East of England Plan seeks the provision of 35,000 jobs over the period 2001 - 2021, an annual average of 1,750. The East of England Forecasting Model (autumn run) predicts job growth of 20,900 in the period 2008 - 2026. This is considered to be unduly pessimistic given the high unemployment rates and levels forecast for the end of the plan period - the model predicts annual unemployment of 8,900 or 3.3% in 2026 compared to 4,500/1.9% in 2008 and 3,900/1.7% in 2004. A pro-growth strategy has been put in place by the East of England Plan. It would be perverse if that pro-growth strategy planned for a higher level of unemployment than before the adoption of the East of England Plan. It should be an aim of the Core Strategy to plan for the delivery of sufficient jobs to return to the pre-recession levels of unemployment. In addition, beyond 2021 household growth continues at broadly the same rate as the period to 2021. Given the importance of Greater Norwich to the regional economy and the presence of key economic drivers such as financial services and knowledge-based industries, the jobs target of 27,000 is considered to be too low. The employment topic paper itself identifies job growth of 28,000 over the period 2010 to 2026. In order to reduce unemployment back to levels experienced before the recession, an additional 4,500 jobs should be added, to provide a target of 32,500 jobs over the period 2008 - 2026.

Summary: the jobs target of 27,000 is considered to be too low.

Joint Core Strategy Proposed submission Document

O - 11220 - 8542 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11220 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The Arup Study of job growth and land requirements places insufficient emphasis on the availability of sites to drive job creation. The focus of the Arup Study appears to be on non-land use measures to deliver growth. We acknowledge the importance of such softer measures, however, we consider that a major element of the strategy must be to ensure that sufficient land is delivered to facilitate the provision of employment floorspace. Indeed, the Arup Study identifies (at para. 1.14) that there is a shortage of available land for development. Given this conclusion we are concerned that the Core Strategy fails to deliver sufficient sites of the right type in the right location at the right time and that this will be a constraint on development. The strategy is reliant on sites which are constrained and unlikely therefore to deliver, particularly in the short term. Whilst we support growth of Science Park activity at UEA, this site is constrained by access and land ownership issues and specifically reserved to meet the needs of the high tech' sector. Studies demonstrate the importance of the growth in high tech' sector and we agree that land should continue to be reserved for such uses. However, as a result there is a need to ensure that the strategy provides for opportunities elsewhere for other economic sectors to grow. We acknowledge the growth of the airport as an important driver of the local economy. However, the Arup Study suggests that this land will be required for uses directly-related to the airport. Such an approach is consistent with the approach previously pursued at Norwich and at other airports. Whilst such an approach supports growth of the economy there is a need to ensure that opportunities exist elsewhere for other non-aviation related businesses to grow. In addition, major growth at the airport will be dependent upon significantly improved access arrangements which are unlikely to be forthcoming in short to medium term. Based on the recommendations of the Arup Employment Study the policy allocates growth at Longwater. Arup's conclusions appear to be based on comments in the supporting text in the South Norfolk Local Plan (SNLP) regarding the future potential of such land. The comments in the SNLP do not constitute policy. It is necessary therefore to compare Longwater against other potential locations. The Arup Study does not appear to do this and further consideration needs to be given to the alternative locations for strategic employment provision. The Arup report also contends that Longwater is a good location for further business park activity. This is despite the fact that Longwater has proven to be an unattractive location for such activity over recent years. Longwater was allocated by the SNLP for B1/B2/B8 uses, but is dominated by retail and quasi-retail uses which in turn impacts on the perception of Longwater as a strategic location for industrial, office and warehousing development. No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. Conversely, there is clear evidence that locations south of the City are strongly in demand for industrial, office and warehousing development. In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery.

Harford Bridge is strategically located on the southern side of Norwich in an area which business demands as a location. It is well placed to build on the success of the Broadland Business Park as a location and is immediately available for development. Our clients continue to receive firm interest from employers and developers regarding the site, demonstrating that this site is an area of strong market demand as an employment location. The case for employment growth on the south side of the city is further strengthened by the identification of Long Stratton for strategic scale growth

Summary:

In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery. The case for employment growth on the south side of the city is further strengthened by the identification of Long Stratton for strategic scale growth

Joint Core Strategy Proposed submission Document

O - 11221 - 8542 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11221 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The Arup Study of job growth and land requirements places insufficient emphasis on the availability of sites to drive job creation. The focus of the Arup Study appears to be on non-land use measures to deliver growth. We acknowledge the importance of such softer measures, however, we consider that a major element of the strategy must be to ensure that sufficient land is delivered to facilitate the provision of employment floorspace. Indeed, the Arup Study identifies (at para. 1.14) that there is a shortage of available land for development. Given this conclusion we are concerned that the Core Strategy fails to deliver sufficient sites of the right type in the right location at the right time and that this will be a constraint on development. The strategy is reliant on sites which are constrained and unlikely therefore to deliver, particularly in the short term. Whilst we support growth of Science Park activity at UEA, this site is constrained by access and land ownership issues and specifically reserved to meet the needs of the high tech' sector. Studies demonstrate the importance of the growth in high tech' sector and we agree that land should continue to be reserved for such uses. However, as a result there is a need to ensure that the strategy provides for opportunities elsewhere for other economic sectors to grow. We acknowledge the growth of the airport as an important driver of the local economy. However, the Arup Study suggests that this land will be required for uses directly-related to the airport. Such an approach is consistent with the approach previously pursued at Norwich and at other airports. Whilst such an approach supports growth of the economy there is a need to ensure that opportunities exist elsewhere for other non-aviation related businesses to grow. In addition, major growth at the airport will be dependent upon significantly improved access arrangements which are unlikely to be forthcoming in short to medium term. Based on the recommendations of the Arup Employment Study the policy allocates growth at Longwater. Arup's conclusions appear to be based on comments in the supporting text in the South Norfolk Local Plan (SNLP) regarding the future potential of such land. The comments in the SNLP do not constitute policy. It is necessary therefore to compare Longwater against other potential locations. The Arup Study does not appear to do this and further consideration needs to be given to the alternative locations for strategic employment provision. The Arup report also contends that Longwater is a good location for further business park activity. This is despite the fact that Longwater has proven to be an unattractive location for such activity over recent years. Longwater was allocated by the SNLP for B1/B2/B8 uses, but is dominated by retail and quasi-retail uses which in turn impacts on the perception of Longwater as a strategic location for industrial, office and warehousing development. No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. Conversely, there is clear evidence that locations south of the City are strongly in demand for industrial, office and warehousing development. In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery. Harford Bridge is strategically located on the southern side of Norwich in an area which business demands as a location. It is well placed to build on the success of the Broadland Business Park as a location and is immediately available for development. Our clients continue to receive firm interest from employers and developers regarding the site, demonstrating that this site is an area of strong market demand as an employment location. The case for employment growth on the south side of the city is further strengthened by the identification of Long Stratton for strategic scale growth

Summary:

No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery.

Joint Core Strategy Proposed submission Document

O - 11222 - 8542 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11222 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: Land at Harford Bridge should be identified as an additional strategic employment allocation at Harford Bridge. The case for employment growth on the south side of the city is further strengthened by the identification of Long Stratton for strategic scale growth

Summary: Land at Harford Bridge should be identified as an additional strategic employment allocation at Harford Bridge. The case for employment growth on the south side of the city is further strengthened by the identification of Long Stratton for strategic scale growth

Joint Core Strategy Proposed submission Document

O - 11234 - 8540 - 04 Spatial Vision and Spatial Vision objectives - i, ii, iii

11234 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: The East of England Plan seeks the provision of 35,000 jobs over the period 2001 - 2021, an annual average of 1,750. The East of England Forecasting Model (autumn run) predicts job growth of 20,900 in the period 2008 - 2026. This is considered to be unduly pessimistic given the high unemployment rates and levels forecast for the end of the plan period - the model predicts annual unemployment of 8,900 or 3.3% in 2026 compared to 4,500/1.9% in 2008 and 3,900/1.7% in 2004. A pro-growth strategy has been put in place by the East of England Plan. It would be perverse if that pro-growth strategy planned for a higher level of unemployment than before the adoption of the East of England Plan. It should be an aim of the Core Strategy to plan for the delivery of sufficient jobs to return to the pre-recession levels of unemployment. In addition, beyond 2021 household growth continues at broadly the same rate as the period to 2021. Given the importance of Greater Norwich to the regional economy and the presence of key economic drivers such as financial services and knowledge-based industries, the jobs target of 27,000 is considered to be too low. The employment topic paper itself identifies job growth of 28,000 over the period 2010 to 2026. In order to reduce unemployment back to levels experienced before the recession, an additional 4,500 jobs should be added, to provide a target of 32,500 jobs over the period 2008 - 2026.

Summary: the jobs target of 27,000 is considered to be too low.

Joint Core Strategy Proposed submission Document

O - 11235 - 8540 - 04 Spatial Vision and Spatial Vision objectives - i, iii

11235 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. Whilst Policy 5 supports the development of a flagship food and farming hub, the vision fails to recognise the importance of strengthening and diversifying the rural economy and the need to support the food and farming industries as significant sectors in the local economy. The potential significance of a food and farming hub is set out in the Feasibility Study for the Norfolk Food Hub (Bidwells and Easton College, May 2006). This reinforced in the Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) and Strategic Employment Sites (Arup, June 2009) which identifies a requirement for new strategic sites for agriculture and food production in the Norwich area.

Summary: Whilst Policy 5 supports the development of a flagship food and farming hub, the vision fails to recognise the importance of strengthening and diversifying the rural economy and the need to support the food and farming industries as significant sectors in the local economy.

Joint Core Strategy Proposed submission Document

O - 11236 - 8540 - 04 Spatial Vision and Spatial Vision objectives - i, iii

11236 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

National policy seeks to ensure the strengthening of rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The vision pays insufficient importance to these national and regional objectives. Whilst Policy 5 supports the development of a flagship food and farming hub, the vision fails to recognise the importance of strengthening and diversifying the rural economy and the need to support the food and farming industries as significant sectors in the local economy. The potential significance of a food and farming hub is set out in the Feasibility Study for the Norfolk Food Hub (Bidwells and Easton College, May 2006). This reinforced in the Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) and Strategic Employment Sites (Arup, June 2009) which identifies a requirement for new strategic sites for agriculture and food production in the Norwich area.

Summary:

Whilst Policy 5 supports the development of a flagship food and farming hub, the vision fails to recognise the importance of strengthening and diversifying the rural economy and the need to support the food and farming industries as significant sectors in the local economy.

Joint Core Strategy Proposed submission Document

O - 11238 - 8540 - 04 Spatial Vision and Spatial Vision objectives - i, iii

11238 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: National policy seeks to ensure the strengthening of rural economies. It also seeks to ensure that food and farming industries remain competitive and can adapt to changing world trade and agricultural policies and practices. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. Greater prominence needs to be given to these policy objectives on the back of the Taylor Review of Rural Economy and Affordable Housing, the RES, the Feasibility Study for the Norfolk Food Hub (Bidwells and Easton College, May 2006), the Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) and Strategic Employment Sites (Arup, June 2009).

Summary: National policy seeks to ensure the strengthening of rural economies. It also seeks to ensure that food and farming industries remain competitive and can adapt to changing world trade and agricultural policies and practices. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. Greater prominence needs to be given to these policy objectives on the back of the evidence base.

Joint Core Strategy Proposed submission Document

O - 11239 - 8540 - 04 Spatial Vision and Spatial Vision objectives - i, iii

11239 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: National policy seeks to ensure the strengthening of rural economies. It also seeks to ensure that food and farming industries remain competitive and can adapt to changing world trade and agricultural policies and practices. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. Greater prominence needs to be given to these policy objectives on the back of the Taylor Review of Rural Economy and Affordable Housing, the RES, the Feasibility Study for the Norfolk Food Hub (Bidwells and Easton College, May 2006), the Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) and Strategic Employment Sites (Arup, June 2009).

Summary: 1 not justified³ inconsistent with national policy. National policy seeks to ensure the strengthening of rural economies. It also seeks to ensure that food and farming industries remain competitive and can adapt to changing world trade and agricultural policies and practices. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. Greater prominence needs to be given to these policy objectives on the back of the evidence base.

Joint Core Strategy Proposed submission Document

S - 11242 - 8547 - 04 Spatial Vision and Spatial Vision objectives - None

11242 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

Support Easton being identified as a location for growth. Easton College, the Royal Norfolk Agricultural Association (RNAA), The Diocese of Norwich and Easton Estates have been working together with Easton Parish Council to develop a vision for the expansion of the settlement of Easton and to improve the educational facilities at the College. Development at the village will help to improve the sustainability of Easton, whilst further expansion at the College will reinforce the College as a centre of excellence for education and sustainability. It is the collective view of the partners that a moderate increase in the size of the village will enhance its form and character, support additional facilities, provide for better traffic circulation and improve services. In short the partners consider these proposals as a means to create a more attractive, sustainable and viable village community. The landowners have been working together to produce a masterplan for the growth of the village. The masterplan demonstrates that modest growth, c1,000 homes can be delivered at Easton in the plan period and that there are no insurmountable obstacles to delivery.

Summary:

Easton College, the RNAA, The Diocese of Norwich and Easton Estates have been working together with Easton Parish Council to develop a vision for the expansion of Easton and to improve the educational facilities at the College. It is the collective view of the partners that a moderate increase in the size of the village will help to improve the sustainability of Easton, will enhance its form and character, support additional facilities, provide for better traffic circulation and improve services, whilst further expansion at the College will reinforce the College as a centre of excellence for education and sustainability.

Joint Core Strategy Proposed submission Document

O - 11267 - 2014 - 04 Spatial Vision and Spatial Vision objectives - ii

11267 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Hempnall Parish Council (Mr I J Nelson) [2014] **Agent:** N/A

Full Text:

Summary: We consider that the strategy cannot be effectively delivered because of the incompatibility of the aims expressed in the grand challenges as set out on page 6 of the proposed submission document. Specifically, it is not possible to enhance our special environment or maximise the high quality of life we currently enjoy whilst at the same time building 37,000 additional homes and securing another 27,000 new jobs (and related infrastructure). The huge scale of the proposed development will require extensive building on green field sites and will dramatically change the existing rural, tranquil character that still predominates in the areas surrounding Norwich. We therefore consider the strategy to be unsound because the aims outlined in the five grand challenges conflict and in many instances are mutually incompatible.

Joint Core Strategy Proposed submission Document

S - 11282 - 2373 - 04 Spatial Vision and Spatial Vision objectives - None

11282 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Persimmon Homes (Anglia) [2373]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary: On behalf of our client we would generally support the Spatial Vision set out in the document and in particular the section relating to Key Service Centres. It is important that these settlements retain their level of services and facilities and this would be achieved by allowing allocations of between 50-200 dwellings in these locations. We would also support the proposals for major development at Long Stratton together with the provision of a bypass.

Joint Core Strategy Proposed submission Document

S - 11289 - 8479 - 04 Spatial Vision and Spatial Vision objectives - None

11289 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Chris Mutten [8479]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary: On behalf of our client we would generally support the Spatial Vision. In particular, the section relating to 'Towns, villages and the rural area'. It is important that the vitality of Service and Other Villages is secured through small scale housing, economic development and other local facilities, which are key to their future success.

Joint Core Strategy Proposed submission Document

S - 11290 - 8479 - 04 Spatial Vision and Spatial Vision objectives - None

11290 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Chris Mutten [8479]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary: This policy provides a broad strategy for growth across the Broadland, Norwich and South Norfolk areas. On behalf of our client we support the identification of a 'minimum' target of 36,740 dwellings. This ensures that, in meeting targets within the major settlements, the requirements of smaller settlements such as those within identified Service Villages such as Reedham can come forward without being prejudiced by the larger housing allocations. Without this target being specified as a minimum there could be a risk to the future of the smaller villages in providing growth to support the services and facilities which already exist in those locations.

Joint Core Strategy Proposed submission Document

O - 11306 - 4736 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11306 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Brian Falk [4736]

Agent: N/A

Full Text:

Summary:

General.1. As intimated by the plan's title this is a Norwich centric document with the contribution and role of South Norfolk District Council's Planning Authority plainly restricted to issues related to South Norwich. Whatever the merits of the plan it virtually down-grades, even neglects, the future needs and prospects of areas outwith the Norwich Policy Area and fails to recommend or seek to establish a 'sustainable community strategy' for a broad swathe of the County's southern boundary.2. The inherent dichotomy of the Strategy lies in its proposals to satisfy 'National Policy' (housing targets) primarily within the Norwich Policy Area, denying the outer areas an effective and sound planning future. It is claimed that these areas will be able to develop subsequent plans to remedy the omissions and inconsistencies in the Joint Core Strategy, but this is not so. The Joint Core Strategy will govern and rule (paragraph 2.6) any subordinate plan (LDF) and any approval of it in its current state will be deemed to underwrite its credibility and robustness. This may be acceptable within the Norwich Policy Area where the bulk of the strategy proposals apply, but lack of planning soundness in relation to areas outside will inhibit and damage those external areas where little is currently considered or proposed.3. For the area around Diss and its surrounding area, to which this representation relates, it is possible to take two views:a. to accept that the Joint Core Strategy proposes virtually nothing new and constitutes a policy of virtually no change. b. to suggest changes to the strategy that will result in the future of Diss and its dependant region being better defined, better tuned to the future and thus likely to be better financed. The following notes result from adopting the second view.Lack of delivery planning4. The Joint Core Strategy (page 25) lists five (bulleted) points that apply to Diss, follows this with twelve (paragraph 4.4) spatial planning objectives, but then fails to apply or reflect these objectives in any planning proposal. Diss, although designated as a main town, is provided with little in the way of development strategy other than an approval to contribute 300 new houses to Norfolk's target total, and expand its convenience shopping footprint (para. 6.72). Diss's Cittaslow designation is cited, but this comes across more as an excuse for treating Diss as a backwater and justifying the omission of a productive and reliable plan strategy for the future.Coherence with the strategy of neighbouring authorities. 5. The Joint Core Strategy is inexcusably inadequate in its dealing with those areas south of the Norwich 'growth' area and this approach is especially damaging to the prosperity and growth of Diss, which has suffered and will continue to suffer from the planning disease of 'boundaryitus'. The fact that a large part of Diss's support hinterland is under the control of another planning authority is referred to, but, as has been the history of planning in the County, no strategy for dealing with or benefiting from this is considered, let alone proposed.

Joint Core Strategy Proposed submission Document

S - 11312 - 8479 - 04 Spatial Vision and Spatial Vision objectives - None

11312 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Chris Mutten [8479]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

In general the objectives as set out are supported, in particular objective 2 which relates to the provision of land for housing and affordable housing. It is important that the objectives enable sufficient land to be brought forward to address the range of settlements identified through the hierarchy as well as the efficient use of land in terms of density. This is also relevant to those sites which are within the rural area and can assist in ensuring that there is sufficient provision of affordable housing coming forward over the Plan period.

Joint Core Strategy Proposed submission Document

O - 11318 - 6826 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11318 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

In many places, the spatial vision is disconnected from past experience and realistic future expectations. These thread through social, economic and environmental issues. We restrict our comments to the introductory statements, the Climate Change and Sustainability section, and objective 9. Other points can be dealt with around specific policies. Introductory Comments: Not justified 1. There is little post-recession evidence to support the assertion that 27,000 new jobs will be created, particularly if 'new' is taken to mean 'additional'. Further there must be a significant time lag before job numbers increase, which affects the growth trajectory and the necessary restructuring of the Norfolk economy to an increased proportion of higher skilled jobs. 2. It is highly unlikely that 36,740 new homes can be built given the economic outlook, and the state of the housing market and construction industry; and if they are, there would be severe deficiencies across the range of hard and soft infrastructure. 3. Unless there is a radical change in Government priorities and policies, the gap between need and provision of affordable housing will get ever wider. In the period 2001-08, which saw strong growth, delivery of affordable housing within all housing provision was 22% for Greater Norwich, compared to the RSS target of around 35% (provision was even lower in the North and Yarmouth Sub-areas). 4. It is seriously misleading to say 'Growth will be focussed on brownfield land in the Norwich urban area and in a very large mixed use urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle'. The latter is essentially greenfield. Of the further allocations proposed to be made in the NPA to 2026, only 3,000 out of 21,000 (of which 7,000 in the growth triangle, rising to 10,000 later) will be in Norwich. There should have been data presented for the Norwich Policy Area showing brownfield/greenfield number for the completions in the period 2001-08; similarly for allocations already made; and estimates for the further proposed allocations. Climate Change and Sustainability; Not justified/Not effective The wording of the policy in several places is weak to the point of having little meaning, for example the statements 'minimising the use of global resources', 'maximising the use of brownfield land' and 'people will use less water'. The domestic consumption of water across the region is 157 litres per person per day. The Environment Agency state that this should be reduced to 110-120 litres per person per day, with a target of 8% reduction in existing households and 25% in new build. It is unlikely that these targets will be achieved. The additional infrastructure required for dealing with waste water is costly and has a long timescale. The issue of transport is conspicuous by its absence, particularly considering its high contribution to domestic output of carbon dioxide emissions. Appendix 8 shows an extensive list for roads infrastructure, and indirectly the consumption of mineral resource. This section and Policy 1 require a comprehensive re-consideration to bring them in line with the Climate Change Bill and the Planning and Climate Change Supplement to Planning Policy Statement 1. Objective 9 The objectives are in many cases in a direct conflict, one with another. We comment on Objective 9, a particular concern of CPRE. We are supportive of the general aim of this objective, which is 'To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value'. However, our view is that little weight can be attached to this. The objective and the supporting text have been written with little regard to the level and rate of development proposed within the Norwich Policy Area, and its actual impact. In our view, there would be a dramatic and unprecedented change in the whole area, with a major loss and suburbanisation of countryside, huge pressures on natural resources, and a radical change to the setting and character of Norwich itself. The first half of the support text describes what we have now. The second half of the text states 'It is a priority to maintain and improve these special qualities...'. It then evades the issues with some 'warm', but not justified, statements such as 'the use of previously developed land will be prioritised to minimise the loss of agricultural land and the countryside', 'biodiversity and locally distinctive landscapes will be protected and enhanced' and 'efficient use will be made of minerals, energy and water resources, and the production of waste will be minimised'. In practice, these statements are essentially about seeking the levels of growth proposed and putting the protection of the natural environment as, at best, a damage limitation task. Specifically, this growth would have a number of significant outcomes. Norwich will change in character with a planned increase in housing stock of some 30% by 2021, and a continuation of these growth rates to 2026 or 2031. This 'fine city' will become encased and lost in an extensive suburbia, especially in the north east 'growth triangle'. The same effect will happen with some of the towns and villages in the south west, especially Wymondham. Further, there will be an extensive loss of productive countryside to other types of development associated with the housing growth, and the proposed road infrastructure. Inevitably this will be accompanied with additional light pollution, with an impact going far beyond the confines of the Norwich Policy Area. Although some EU water dependent sites of nature conservation might receive adequate protection, but those in the wider countryside will not, affecting both landscape and biodiversity. In turn the level of mineral extraction required for this rate of development across the county will cause further collateral damage.

Joint Core Strategy Proposed submission Document

O - 11329 - 8570 - 04 Spatial Vision and Spatial Vision objectives - i

11329 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Summary Hethersett Land Ltd contends that the JCS is not sound because it can be demonstrated with evidence that certain of its spatial objectives (JCS, Section 4.4) cannot be achieved by implementing the chosen spatial strategy and policies. The GNPD's own evidence demonstrates that if implemented, the JCS's spatial strategy would undermine the ability to achieve a number of its stated objectives and in some cases would run completely contrary to the objectives and result in unsustainable development in poorly located and relatively poorly served settlements in South Norfolk. It is therefore internally inconsistent, and fails against the Effective soundness test. Main representation The JCS fails the Effective soundness test, because it can be demonstrated that: "The spatial strategy, policies and objectives are internally inconsistent. Hethersett Land Ltd has made a series of representations that demonstrate why the JCS fails the legal compliance test and the soundness tests. This representation is concerned with the JCS's spatial strategy's failure against the Effective soundness tests and demonstrates the evidence that has led to this conclusion. Hethersett Land Ltd has submitted other representations that demonstrate the JCS's failure against the Legal Compliance test and the Justified and National Policy soundness tests. Objective 1 Hethersett Land Ltd notes that the JCS's first objective is to minimise the contributions to climate change and address its impact. One of the contributors is cited as carbon emissions. It is generally acknowledged that one of the sources of carbon emission is that from motor vehicles, particularly the private motor car. Hethersett Land Ltd therefore consider it questionable that the South Norfolk strategy of dispersing growth to locations without a full range of services, jobs and good access to public transport can help to achieve this objective, particularly where the level of growth at these settlements is such that it would not support provision of new services, jobs and public transport.

This point is acknowledged in the Sustainability Appraisal (SA) related to Long Stratton's identification as a strategic growth location. The SA states "...at Long Stratton there are serious question marks relating to the potential for sustainable transport due to isolation from higher order centres and major employment locations". Also that "...[strategic] Growth in Long Stratton has the potential to be less sustainable" (page 39)...it is more difficult to say whether the local level benefits associated with [strategic] growth outweigh the more strategic disbenefits..." (page 72). Also "...a question is raised as to whether the dispersed nature of growth in South Norfolk and the isolated nature of Long Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport" (page 143). The SA also suggests "...the need for a bespoke vision for an ambitious degree of self containment within Long Stratton". However, this is still missing from the JCS. The implication being, that there will be an increase in private motor vehicle traffic emanating from Long Stratton, and therefore a consequential increase in carbon emissions, since the public transport improvements will be relatively limited. Similarly, the SA also acknowledges that "...smaller growth locations in South Norfolk will struggle to bring forward the same level of local services and facilities that can be brought forward at the North East Norwich Growth Area" (page 144). In other words, the SA demonstrates that elements of the South Norfolk growth dispersal strategy do not contribute to JCS objective 1, minimising the contributors to climate change, because it proposes growth in settlements where the only viable travel option will be the private motor car. Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked at individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability." Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk must have an impact on the sustainability objectives of the JCS, not least reducing the need to travel particularly by the private motor car traffic. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main travel choice will be the private motor car will have a cumulative impact on transport patterns and lead to an increase in carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS objective 1, and is significant failure in the approach. Objective 2 Hethersett Land Ltd notes that the JCS's objective 2 is to allocate enough land for housing in the most sustainable settlements. It suggests that the settlement hierarchy defines towns and villages with a good range of jobs, services and facilities. However, the GNPD's own Sustainability Appraisal questions the sustainability credentials of the chosen spatial strategy particularly the dispersal of growth in South Norfolk and the allocation of strategic growth at certain locations including Long Stratton. There are also unanswered questions about the sustainability credentials of identifying other Service Villages identified for lesser levels of growth. Hethersett Land Ltd notes that Service Villages have been identified on the basis of the number of services they offer. However, there is some uncertainty whether certain of the 'services' actually contribute to a settlement's sustainability, such as a garage or a church. There is no evidence to demonstrate that a garage or church for example, contributes to the sustainability of a settlement, particularly related to reduce the need to travel by private motor car. More importantly, there are also issues about the proximity of jobs to many of these smaller Service Villages. Many of the villages identified for growth in south Norfolk have very limited job opportunities, and the most

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likely method of travel to jobs in the larger urban areas, including Norwich and the main towns will inevitably be by the private motor car, because the public transport services are not at the moment a viable alternative, and the ability for them to be improved is restricted by the limited scale of growth proposed. The SA also highlights the fact that the most sustainable settlements in South Norfolk i.e. those with the largest range of facilities and/or within the proximity of major employment areas including Wymondham and Hethersett performed very well in sustainability terms and until December 2008, these settlements were considered to be amongst the most sustainable locations for strategic growth. Both of them had higher housing numbers attributed to them; Hethersett in particular had a significantly higher housing number, given its proximity to major employment sites such as the Norwich Research Park and the City Centre, and easy accessibility to jobs, services and facilities by means other than the private motor car. However for political reasons (as demonstrated in Hethersett Land Ltd's other representation), the housing numbers at these locations were reduced. In conclusion, it is Hethersett Land Ltd's contention that the GNDP's own evidence suggests that the JCS's objective 2 to allocate enough land for housing in the most sustainable settlement is not reflected in the chosen spatial strategy, particularly the South Norfolk growth dispersal strategy. The spatial strategy actually runs contrary to objective 2 in that it limits growth in the most sustainable locations and distributes it to demonstrably less sustainable locations. Objective 7 Hethersett Land Ltd notes that the JCS's objective 7 is to enhance transport provision and reduce travel need impact. It is suggested that the location of development as proposed in the JCS will reduce the need to travel especially by private motor car. The aspiration is to have a Bus Rapid Transport (BRT) system on key routes in the Norwich Area. However, Hethersett Land Ltd contends that the GNDP's own evidence suggests that the chosen growth strategy undermines the fulfilment of this objective. The County Council's technical note "Public Transport Requirements of Growth - Appraisal of Emerging Option, Dec 2008", assesses what was then, the emerging, but is now the chosen growth distribution strategy. It notes that the initial premise for identifying the locations and levels of growth in the Norwich Policy Area (NPA) was that "...new growth locations should be expected to out perform the existing urban area in terms of their contribution to the overall mode share targets for the NPA". However, key findings from the County Council's assessment of the option include: * Previous work has concluded that a distribution of housing growth based on a smaller number of larger developments would be the preferred option from a public transport perspective. * The effect of the dispersal of housing growth across a greater number of sites in South Norfolk District relative to all options considered previously [including 4,000 at Hethersett] is that on the assumptions made, none of the individual growth locations is proposed to generate sufficient real demand in 2021 to support a dedicated 'turn up and go' service operating every 10 minutes. * For Hethersett with 1,000 units the level of peak demand in 2021 is sufficient to only "support a dedicated service operating every 30 minutes, or an enhancement of existing services. * The chosen dispersal of housing growth within South Norfolk results in none of the proposed growth areas being of sufficient size to individually support a 'turn up and go' service"; * There is a further concern with developments of less than 2,000 homes as proposed at Long Stratton, Hethersett, Cringleford and Easton, that they may be too small to effectively implement the concept of Public Transport Orientated Development and it will be difficult to achieve a step change between the public transport mode share for the new developments and the existing public transport mode share for travel to Norwich; * By limiting growth on the A11 corridor, the BRT viability along the corridor is at best marginal however, combining the locations and adding further housing would help; * The growth at Long Stratton is insufficient to support the developments of a bus rapid transport service. Improvements to existing services is the best that can be achieved; * The spread of 1,800 homes across smaller settlements in the South Norfolk fringe of Norwich risks the dispersal of public transport demand on a way that will not support significant improvements to existing bus services, other than Mulbarton and Poringland. It is Hethersett Land Ltd's opinion that this evidence coupled with that in the Sustainability Appraisal which remarks about the inability of the chosen spatial strategy's to encourage public transport, suggests that the fulfilment of objective 7 to affect a modal shift in public transport usage is limited, if not completely undermined by the chosen spatial strategy. It is clear that the growth dispersal approach in South Norfolk will result in greater use of the private motor car. This evidence also helps to demonstrate that the South Norfolk approach will not contribute to sustainable development. Conclusion It is Hethersett Land Ltd's contention that there is an inconsistency between certain of the JCS's spatial planning objectives (Section 4.4) and the chosen spatial strategy, particularly the growth dispersal strategy in South Norfolk. The JCS therefore fails the Effective soundness test. The GNDP's own evidence demonstrates that many of the JCS's objectives cannot be met with a growth dispersal strategy in South Norfolk. Hethersett Land Ltd suggests that in order to deliver sustainable development and effect a step change in sustainable transport patterns, growth needs to be focussed in a smaller number of locations rather than dispersed to a larger number of smaller settlements. This focussed growth pattern at settlements close to jobs, services and facilities at a scale sufficient to provide the level of customers to justify first rate public transport facilities is the only way to secure the step change in traffic modes away from the private motor car. This is acknowledged by the GNDP's own evidence. Only by adopting this alternative spatial strategy will many of the JCS's objectives be achieved, including limiting the contributions to climate change (including private car emissions); allocations enough land in the most sustainable settlements, making sure people have ready access to services, enhancing transport provision and reducing travel need and impact. To continue with the existing strategy of growth dispersal will inevitably lead to many of the objectives remain unfulfilled. It also fails the Justified soundness because the strategy is not the most appropriate in light of the alternatives.

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Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary: We support in principle the spatial vision in particular as it relates to Wymondham.

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Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: This is an executive summary of the main thrust of our representations on the JCS and is conveniently positioned in the section of our representations on Strategies Vision and Objectives.0.2 We find the JCS to be unsound on the grounds of legal compliance and content compliance requirements as set out in the Planning and Compulsory Purchas Act 2004 and PPS12. We outline the individual reasons for non-compliance and the cumulative case. Therefore we recommend the JCS is withdrawn, repaired and re-advertised for consultation before it proceeds to its Examination stage.0.3 We have attempted to approach representations on the JCS comprehensively, rather than simply seek to promote a site specific interest. We have commented on policies 1 to 20 where relevant to do so. Many of the amendments to policies could be dealt with by minor modifications to the text.0.4 Our fundamental concerns are in respect of the following major matters;* the failure at the option stages of the JCS to consider sufficient variety and extent of options for the distribution of residential development leading to a submitted strategy and distribution that is not deliverable in the timescales indicated in the RSS;* the failure of the GNDP to publish the relevant parts of the evidence base in advance of the decision making process for the options and submitted JCS; * the misinterpretation of the policy on Strategic Gap as it affects the decision making on the options for housing distribution and amount;* the extent of the inaccuracies in the Infrastructure evidence base prepared by EDAW and the impact these have on the distribution of housing development.0.5 In view of the outcome of the Norwich Common appeal Decision and the failure of the JCS residential trajectory and proposals to meet the housing requirements of the RSS and the 5 year housing supply, it is clear that the residential distribution strategy must change as these requirements cannot be met if the LDF proceeds to the Site allocations phase without considering further releases of housing land. In Short, if all the current broad locations for development have to be ratified through the LDF and the Site Allocations Examination in particular then the JCS will fail to meet the RSS and 5 year requirements for housing delivery and fail to respond to the Inspectors, as supported by the SoS, guidance contained in the Norwich Common appeal decision. This advice, in short was to ensure actions are taken to release land to meet these two housing requirements.0.6 We recommend the housing strategy be amended to;* plan for an over provision of dwelling completions to 2026 to ensure at least the RSS minimum housing requirements are met and that a flexible and rolling land supply beyond 2026 can be provided.* identify early release, through the JCS, two major Strategic Sites at Wymondham and NE Norwich. We provide new Policies for these proposals in commenting on policy 20 of the JCS.* sub-divide the remaining allocations of dwellings between SNC and Broadland, to allow the opportunity for both Councils to respond to the challenge of the need to release land earlier than the completion of the Site Allocations process and to prepare their Site allocations DPD separately.0.7 We have attached Counsels advice (attached to the rear of this Part 1) on the matter of Legal Compliance and the Soundness of the JCS.0.8 We set out these objections in more detail in our representations on sections 1 to 4 of the JCS which focus on the Strategic vision and objectives. In sections 5 to 8 we comment on policies 1 to 20.0.9 The appendices we attach are common to all our reps and cannot be sub divided with each rep.0.10 We would be happy to meet with representatives of the GNDP to consider the amendments that could be made to the JCS to render the JCS sound. 1.0 COMMENTARY ON SECTIONS 1 TO 4 OF THE JCS AND OVERVIEW OF OUR CASE ON THE SOUNDNESS OF THE JCS1.1 Advice on how to prepare the JCS and what to include is contained in PPS12 and various advice notes from PINS and the PAS documents. In particular, we rely on the following advice:* PINS "Examining Development Plan Documents Soundness Guidance" (Aug 2009, 2nd edition)* PINS "Local Development Frameworks: Examining Development Plan Documents: Learning from Experience" (Sept 2009)* PAS "The Plan Making Manual" (2009)1.2 The proforma sent out by GNDP entitled "DPD - Publication (Pre-submission) Stage Representation Form", attached a guidance note summarising the grounds for testing the soundness of the JCS. These are essentially legal compliance and content compliance, including whether the DPD is justified, effective and in accordance with national planning policy.1.3 The purpose of this section of our representations on the JCS is to summarise the areas of support and objection on the JCS and, where we object, to indicate whether the individual matter is sufficient to find the JCS unsound or whether cumulative objections are sufficient to find the JCS unsound. We provide in this section the reason for objecting and summarise in the conclusions the soundness test the matter appropriately relates.1.4 We raise our objections and state our support while reviewing the contents of the first four sections of the plan (Our Strategy; Introduction; Spatial Portrait; and Spatial Vision and Objectives)1.5 We do not comment on every aspect of the JCS, however, we do take a comprehensive rather than narrow approach. Our intention is to comment on all sections where we find non-compliance with the tests of soundness.1.6 We act on behalf of a developer/investor/landowners who collectively own and has interests in land in the Norwich Policy Area (NPA) at Wymondham, at North East Norwich and various key settlements at Taverham, Poringland and Stoke Holy Cross. We make it clear at the outset that our clients, United Business Leisure the Barnard Family and Others, are seeking the following site specific aims during the LDF process:i. Release of a "strategic site" in accordance with paragraph 4.6 of PPS12, at Wymondham in the context of the JCS, combining land at NE Wymondham and S Wymondham for housing, employment, leisure, cultural and public open space (subject of attached masterplan). ii. Release through the Site Allocations DPD land for development of housing and employment in Poringland.iii. Release of a "strategic site" at NE Norwich in the context of the JCS, including my client's ownership interests for housing and associated developments1.7 The JCS implements the East of England RSS by referencing and including proposals and policies which take the RSS to the level of detail appropriate for a LDF. Our area of objection in this respect is the interpretation of RSS policies in the JCS.1.8 We understand the JCS must, in effect, be a summary of the findings of its evidence base and the amount of detail

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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produced in the JCS should be proportionate. The evidence base should inform what is in the plan rather than being collected retrospectively in an attempt to justify the plan. Our representations consider whether the evidence is being produced retrospectively and whether it is absent, flawed or out-of-date in relation to the conclusions drawn in the JCS.1.9 In section 1.0, page 4, we believe the correct challenges should be reworded in terms of the delivery of strategic aims in the RSS to local aims in the JCS for the environment (including climate change), houses, jobs, place making, and infrastructure (including energy).1.10 We believe that in the lead up to the publication of the JCSPS, different options for the location of housing development were considered. These options considered a range of growth targets in settlements and sub-areas and in the form of freestanding new settlements (Rackheath Eco-Town and at the A140/A47 junction at Mangreen). Our concern is that total reliance is put on options which spread the impact of development around a number of locations. There was no option, for example, of locating development in just two locations, A11 corridor and NE Norwich quadrant with the remainder on medium and small sites. Such an option would have allowed early release of small and medium sites through other mechanisms other than awaiting the completion of the DPD process and would have allowed for a more flexible approach that could respond to shortages of land. This approach is advocated by the Norwich Common Appeal Inspector (Appendix 2 Rep 5-8). The alternative could have, for example, followed the advice on page 8 of the JCSPS that the A11 and NE Norwich areas perform well for development and could have concentrated development as follows: Wymondham 6,000 to 8,000North East Norwich 8,000 to 10,000Norwich 3,000 to 4,000Broadland/SNC Small/Medium 4,000 to 7,000 Table 1: Possible pattern of growth1.11 The only reason given for not concentrating major growth in the NE Norwich and A11 settlements were that settlement character would have been altered and the degree of separation between settlements and Norwich would have been eroded: "Concentrating all growth on the A11 corridor would result in the excessive expansion of Wymondham and Hethersett, altering not only the character of the settlements themselves but also eroding the degree of separation between settlements" (JCSPS, p. 7)1.12 However, these impacts were never tested because this scenario was not an option. Neither did the options test matters such as density, the rate of development and delivery mechanisms. Our concern remains that the JCS Options stages considered far too few and too narrow a selection of options in order to properly test the 'what if' scenario favoured by PPS12. 1.13 The JCSPS recognises (Page 10) the authorities are not "geared-up" for delivery, that the economic climate is uncertain, that funding from infrastructure authorities is uncertain. It is accepted and supported that these uncertainties are recognised and stated in the JCSPS. On page 12 it is stated that infrastructure to support development is identified and a cost provided, but the funding source is not agreed and needs to be made explicit.1.14 The spatial vision, Section 4, sets out a clear distribution strategy for housing and employment and recognises the impacts of development on climate change, the environment, communities and transport.1.15 We support the objectives on pages 26 to 28 but feel they must be modified to reflect RSS objectives and policies and that those parts of the spatial strategy that are contrary to the objective should be identified as follows: Support/objections to spatial objectivesObjective 1: To minimise the contributors to climate change and address its impacts.Objection: It must be recognised that the transport budget is heavily geared towards historic road building programmes, including the Northern Distributor Road (NDR), Long Stratton Bypass and various junctions listed in the transport section. This is clearly contrary to minimising the contributors to climate change and alternative public transport solutions should be evaluated and costed.Objective 2: To allocate "enough" land for housing.Objection: This must be changed to reflect RSS Policies H1 and H2 to allocate "at least" the targets expressed. It must also make clear that the target to meet is the RSS requirements at 2021 and not as suggested the target to 2026. The 15 year period for housing projections from the approval of the JCS is not the target date for housing. Objective 3: To promote economic growth and diversity to provide a wide range of jobs.Objection: This is too vague an objective and more applicable at the RSS level. The objective should make it clear that the plan "intends to identify and allocate strategic and sub-area strategic sites for employment and additional employment in other locations that accord with Policies NR1, E2 and E3 of the RSS. The JCS should allocate specific broad areas for at least regional and sub-regional employment sites.

Objective 5: To allow people to develop to their full potential by providing educational facilities to support the growing population.Support: We support the fact that education has been identified as a major objective for the spatial vision. It is vital to see how this aim transfers to the "Policies for Places" in terms of actual proposals. Our concern is that the dwelling distribution strategy will not encourage new investment in schools. Objective 6: To make sure people have ready access to services.Support: Again, we support the fact that access to existing services is seen as a main driver for locating development. However, we are concerned this has not been taken account in terms of securing key new infrastructure, especially in the case of a BRT and a new secondary school at Wymondham.Objective 7: To enhance transport provision to meet the needs of existing and future populations while reducing travel needs and impact.Support/Object: We support the priority given to this objective. It reinforces the step change towards sustainable forms of transport provided for in Policy NR1 of the RSS. However, we object to some of the locations chosen for development because they run contrary to this objective and are located to bring forward major road schemes, i.e. Long Stratton bypass, the Northern Distributor Road.Objective 12: To involve as many people as possible in new planning policy Object: This objective does not transfer to other sections of the plan and is not appropriately part of the spatial plan for the area. We suggest it is deleted. Objections to the JCS and the extent to which the JCS is unsound1.16 One of the key elements of the LDF system is the delivery of the vision of the authorities and its partners for the area. The effectiveness test of soundness in PPS12 is essentially about delivery. Many of the objections we raise below and continue through to representations on other sections of the plan relate to delivery. A. Housing objections: SHLAA retrospective justification1.17 Any consideration of a Strategic Housing Land Availability Assessment (Stage 8 SHLAA) at a DPD examination will be aimed at establishing whether it is sufficiently robust to justify and support the delivery of the plan.1.18 The SHLAA should have been prepared in full consultation with the development industry and there are only limited signs of this.1.19 The Stage 8 SHLAA was published in Sept 2009 and did not inform, as an evidence base, the decisions on previous consultation stages of the plan when housing options were considered (Reg 25 Technical -

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Aug 2008; Reg 25 Public Consultation - March 2009). Therefore the evidence base for housing options could not have been justified or supported by the SHLAA. In effect the SHLAA attempts to justify the strategy retrospectively. B. Lack of information for submitted option 1.20 The "Strategy to accommodate major housing growth in the NPA - Topic Paper" (Sept 2009) pages 5 to 8 summarises the evolution of the housing options. It is important to note (last paragraph of p. 7) that the officer's favoured option at 18th Dec 2008, following substantial consultation and based on the evidence available at that time was, Option 1 as follows: Location Option 1 Submitted Option Norwich 4,000 3,000 Broadland smaller sites 2,000 2,000 South Norfolk smaller sites 2,000 1,800 NE Norwich (Sprowston/Rackheath) 6,000 7,000 (rising to 10,000 after 2026) S West (Hetherset/Cringleford) 4,000 1,000 1,200 South (Mangreen, Swardeston, Mulbarton) 0 0 Wymondham 4,000 2,200 West (Costessey/Easton) 2,000 1,000 Long Stratton 0 1,800 Total 24,000 21,000 Table 2: Comparison of the Officers' recommended option Dec 2008 with the submitted housing option 1.21 We compare in Table 2 the Officers' option with the submitted option. The only justification provided in the Topic Paper (Sept 2009) for moving from the Officers' recommended option to the option tabled by South Norfolk Council and which eventually became the submitted option, was that it presented "a better fit with the existing settlement character and pattern of South Norfolk, but also that it presented 'significant challenges'" (p.8). No evidence base was produced to test this changed distribution or whether the alleged impacts were real or politically motivated. In effect, South Norfolk Council (SNC) appeared to have reduced the amount of development in the submitted plan for certain South Norfolk settlements by reducing the overall provision from 24,000 to 21,000. They had intended that reliance be placed on new settlement provision at the Mangreen of somewhere between 2000 and 5000 dwellings depending upon the option viewed before 2026, but the PINS Report reviewing the JCS (PreRJCS) presented on 19th Feb 2009 criticised this assumption and it was withdrawn. The submitted option is therefore not justified by the evidence base and the only option that is justified by the evidence base, and the results of public consultation, is Option 1 (18 Dec 2008); supported by the officer's working group. C. Failure to deliver 5 year housing supply and 2021 housing targets 1.22. In sections 1.0, 2.0 and 4.0 of the JCS the main challenge identified is to meet the housing requirement between 2008 and 2026. This is not correct. The appropriate challenges are to demonstrate an adequate 5 year housing supply (PPS3, Para 70); identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15 (PPS3, Para 55). The roll forward to 2026 to provide for a 15 year supply of housing from the approval of the LDF in 2011 is no justification for not meeting the RSS housing targets to 2021 and the above PPS3 requirements. In doing so, the plan will have provided for a flexible but deliverable housing land supply. We demonstrate in our representations (Representations on GNDP JCS Section 5 to 8) on the Housing Section of the plan and Policies For Places, that the RSS housing targets cannot be met. This is indicated in the trajectory for the NPA (JCSPS, Appendix 8 p 109) as well as in our separate representations and was also highlighted in the recent Secretary of State Appeal decision relating to development at Norwich Common Wymondham (APP/L2630/A/09/2097802). (CD73) D. Lessons from the Norwich Common Appeal Decision (Nov 2009) 1.23 The Appeal Decision and Secretary of State and Inspector's reports are located in Appendix 2 of the accompanying representations document Representations on GNDP JCS Section 5 to 8. The decision is up-to-date and provides comment on the housing supply in the NPA. The appeal site for 323 dwellings is part of the urgent action required to resolve the current housing shortfall in the NPA and assists in meeting the identified failure of the housing supply identified in the NPA in order to meet the 2021 housing requirement set out in the RSS. 1.24 The decision needs to be read in its entirety but the parts that are important to the representations on the JCS can be summarised as follows: (Inspector's Report Paragraph References on housing supply) 5 year's supply and RSS Para 189 "There is not a 5 year supply of deliverable housing sites in the NPA [84, 106, 107]. The appellants' calculation as at 1 April 2008, based on their definition of completions which differs from that of the Council, was of a 4.3 years supply whereas the Council's first AMR for 2007/08, described as the most robust and reliable calculation, showed 4.4 years supply, a shortfall of 1,000 dwellings [84, 86, 107, 109]. The monitoring exercise is currently being undertaken for 2008/09 so the Council were unable to provide a more up to date figure but it accepted that the supply had not improved and that the best evidence to date was that the latest AMR was likely to show a supply of around 4.3 years, increasing the shortfall to at least 1,250 dwellings [87, 88, 108]." Para 192 "Within the Policy Area at times it will be appropriate to look to delivery of the 5 year supply from the other districts as some of their larger housing allocations come on stream, such as Rackheath in Broadland [89, 92]. However the Council itself acknowledged the difficulties of bringing forward large sites in a timely manner. Whilst Norwich has been relied upon as a fluid source of supply having more small sites, current conditions and changes in market demand, with flatted schemes in Norwich being re-planned as town houses, could impact on its potential contribution towards overall housing supply in the NPA [89, 92, 111]. Unless timely allocations are made and/or, as the Council acknowledges, windfall sites released, this approach carries the risk of a continuing shortfall in the short term and, if delivery is delayed, in backloading supply to the latter part of the RSS period [111]." Para 193 "Work is progressing on the JCS but even on the Council's own programme the Site Allocations DPD will not be adopted until late 2011 and this could slip [91, 106, 110]. The Council acknowledges that levels of supply are likely to decline for the 5 years from 2009 and whilst I note that it is possible that some of the smaller site allocations might be brought forward in 2013, this assumes their easy and speedy delivery [90]." Para 194 "The table produced by the Council indicates that by 2021 completions could fall short by some 13,560 of the RSS requirement for 33,000 dwellings, if no account is taken of sites to be identified through the LDF process [91, 110]. It reveals the high annual rate of completions that will be required if the RSS target is to be met and, given the time that it can take to bring forward larger housing schemes, the need now for a step change in delivery by the authorities in the NPA [111]." On Wymondham as a sustainable location Para 199 "The Council accepts that, other than the conflict with LP policy ENV2 (which I address below) the site is suitable for housing (3rd bullet point paragraph 69) [119]. Wymondham is identified as a sustainable location for development in the LP and in the emerging JCS documents [20, 28, 36, 102, 113, 114]. The proximity of the site to community facilities, key services, employment areas and infrastructure is explained in the DAS [37, 102, 146, 147, 154]. There is a rail station in the town accessible by bus and within cycling distance and buses to Norwich pass the site. The Highway Authority and Anglian Water have confirmed that subject to agreed off-site works, the site can be

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satisfactorily serviced, in accord with LP policy IMP7 [37, 38]. Appropriate contributions are agreed in the S106 Agreement towards education, library and community facilities and recreational space [166, 178]." On NE Wymondham strategic gap issue Para 203 "The key to the LP Proposals Map describes the ENV2 land as 'strategic gaps'. Neither the 1993 nor 1999 Structure Plans Key Diagrams extended that level of protection to the open land between Hethersett and Wymondham and it was agreed at the inquiry that the terms 'green wedge' or 'gap', found in the policy and text of the Plan, should be applied [54, 57, 122, 123]." Para 204 "There was an exhaustive trawl at the inquiry through the two reports of the Deposit Draft Local Plan Inspector and the Modifications Inspector to examine the evolution of policy ENV2, the function of the gap and the identification of its final policy boundary north of Wymondham to include the appeal site but not the Whispering Oaks site [59, 60, 125]. It is noteworthy that neither Land Use Consultants (LUC) in their Landscape Assessment nor the Council had chosen to define the gap precisely in its Modifications, the boundary of which was drawn on the adopted LP Proposals Map on the basis of the Inspector's written description [58, 61]." Para 206 "Having said that, I do not accept that because the issue of the gap was determined at the LP Modifications Inquiry, the ENV2 boundary is now immutable [57, 63, 126, 127]. The 2008 RSS requires the NPA to provide a substantial level of new housing. Its environment policies, particularly policy ENV2, reflect the shift in Government thinking, first set out in PPG7 and now in PPS7, for the inclusion of carefully drafted criteria based policies in LDDs to protect local landscape character, outside the nationally designated areas, rather than rigid local designations [19]. PPS7 at paragraph 25 is very clear as to what is required of local planning authorities and 'when reviewing their local area-wide development plans (they) should rigorously consider the justification for retaining existing local landscape designations' [126]." Para 207 "Thus whilst the draft policy in the JCS consultation refers to growth at Wymondham being achieved 'whilst maintaining the strategic gap to the north and north east' [62], the GNDP as the plan making body will have to justify the maintenance of that gap with robust and credible evidence; a point made strongly by the Advisory Inspector in her February 2009 note. Both PPS7 and RSS policy ENV2 refer to the need for there to be a robust assessment of the qualities of the local landscape and in the new plan making system, where strategies must be supported by evidence, it will not be enough to rely on the 2001 landscape assessment carried out to inform the LP Modifications which in any event did not establish any boundaries to the gap [58]." Para 208 "Moreover any up to date assessment will necessarily have to take account of the changes that have taken place, or will take place, within the gap [71-76, 129]. In particular the new buildings at Elm Farm that are close to and prominent from the B1172 [76] and the Council's resolution to grant permission for the relocation of the Rugby Football Club with a new access in the same location as the appeal proposals [7, 74, 75]. The completion of the Whispering Oaks development with building to the south side of Downham Grove will also have an impact on perceptions of the area's landscape character and views [71]." Para 210 "The ENV2 notation between Hethersett and Wymondham extends around 2km along the B1172 and from the A11 north towards Wong Farm. In that it is intended to maintain a physical segregation between the settlements and their individual identities, my perception was that this was essentially achieved by the mid section where there is farm land on both sides of the road north of Elm Farm allowing those travelling between the settlements wide views of the surrounding open fields and scattered woodland. From there going south there is a ribbon of development, albeit loose and with gaps, on the western side of Norwich Common which contains and limits views of the countryside beyond [8, 66]." Para 211 "I found that the appeal site, as a result of its proximity to the built up area and the visible urban influences, differs in character from the more rural and open countryside to the north and east [6, 8]. The nature of the plateau topography and the extent of the site's physical and visual containment limit appreciation of its contribution to the gap [130]. I did not find it to be an important component of the landscape between Hethersett and Wymondham that enables their physical separation to be maintained. Nor that it was necessary for the site to remain undeveloped to ensure coalescence did not occur [130]." 1.25 The Secretary of State agreed and confirmed the Inspector's findings. It is therefore clear from this recent decision that: i. The NPA has less than a 5 year housing supply and the shortfall is growing steadily larger. In Appendix 1 Repts 5-8 we show there is likely to be a shortfall in the 5 year supply to 2021. ii. The RSS housing requirement for the NPA to 2021 cannot be met by current commitments and that more of the LDF allocations will be required to be released in order to deliver dwellings in order to maintain a rolling 5 year supply.iii. Ways to reduce the shortfall and provide a more flexible housing supply in accordance with PPS3 should be considered. Para 65 of PPS3 makes it clear that: "If at any time, actual performance is outside the acceptable ranges or is at risk of not being met in the future...LPAs will need to establish the reason for these performance issues and take appropriate management action could (sic) be to update the quantity and mix of different categories of land within the five year supply of deliverable sites to redress the balance of land available for development" (PPS3, Para 65).iv. South Wymondham and NE Wymondham are sustainable locations for development.v. The gap between Wymondham and Hethersett is not a strategic gap and never has been. Incorrect weight is put on this constraint in deciding the distribution of development. 1.26 The increasing shortfall in the 5 year housing supply, the lack of flexibility in the housing supply, the reliance on flatted commitments in Norwich City, the reliance on large sites through the LDF Site Allocations which take some time to deliver, and the failure to deliver the 2021 requirement, tends towards a conclusion that it would be more appropriate to allocate fewer large scale sites and release the remainder as smaller to medium sites. The larger scale sites which would have a strategic impact on the plan should be released as "strategic sites" through the JCS in accordance with PPS12 Para 4.6, in order that they come forward earlier. Our representations identify certain areas where the strategy to locate development is simply to implement a road proposal, like Long Stratton and this is contrary to the objectives of the JCS and PPS1 on Climate Change. The allocation of 1,000 dwellings in the Easton area, where there are few existing facilities is not supported by the sustainability appraisal. The allocation of 1,000 dwellings in Hethersett, when there are identified gaps to the west and east (strategic), and when to allocate to the north would drag all new traffic generation through the village, is also not supportable.1.27 Our preferred option for the distribution of housing, taking into account the above factors and the presence or lack of an adequate existing facility base, based on the JCS requirement of allocating land for 26,250 new dwellings to 2026 for the reasons set out above and in our Representations Part 2 Section 5 to 8, is as follows: Location No of dwellings CommentsNorwich 3,000 Constrained by flatted commitmentsBroadland (smaller/medium sites) 5,000 Medium sites up to 500 dwellingsSouth

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Norfolk (smaller/medium sites) 4,750 Medium sites up to 500 dwellingsNE Norwich and Rackheath Eco Town 7,000 Alteration to strategic site releaseWymondham 6,500 Alteration to strategic site release (4,000 by 2026)Total 26,25023,750 to 2026+2,500 post 2026 Table 3: Our proposed new pattern of growth E. Failure to deliver on affordable housing needs1.28 A comprehensive evidence base on housing need is presented in the Greater Norwich Housing Market Assessment 2007 (SHMA) but it is out of date for the purposes of supporting the JCS as its base date is 2006 and it clearly does not reflect the uncertainty and viability issues of the current market.1.29 There is very little evidence about how deliverability of the affordable housing targets will be achieved. The evidence accepted at the Norwich Common Appeal on viability demonstrated that a quota of only 25 percent is achievable against the JCS requirement for 40%. There is much evidence to support the need for 40% affordable housing, but there is limited evidence on viability to test whether this level is achievable. It is of no value to the JCS to insert a requirement of 40% subject to a viability test, only to find that, in the majority of cases, viability would demonstrate that far less than 40% is achievable. The Blyth Valley judgement (Blyth Valley B.C versus Persimmon Homes (North East) Ltd, Barratt Homes Ltd and Millhouse Developments Ltd) shows there is a crucial need for viability evidence and currently no up-to-date evidence is available to support the 40% requirement.F. Employment - objections Failure to identify Regional Strategic and Sub-Regional Strategic employment sites using the criteria for identifying such sites in the NPA1.30 The RSS Policies E2 (employment in urban areas, market towns and key rural areas), E3 Strategic Employment Sites (Norwich to support regeneration and its role in bio-technology), E4 employment clusters (green technologies) Key characteristics of Regional Strategic Sites1.31 High quality sites which are attractive to national and international investors in Norwich linked to Cambridge, motor sport at Hethel, and multi-media links to London-Norwich) should be transferred to the LDF in the form of sites or broad areas for employment development which have a particular purpose and which differentiate regional strategic from sub-regional strategic and other employment sites.1.32 Policy NR1 of the RSS identifies the locations for employment growth which includes Wymondham/A11 Corridor (High technology and rail related). The JCS should identify which of these locations is to be of regional strategic scale or importance and which should be of sub-regional scale or importance and spatial objective 3 (page 26 JCS) should be modified to reflect this approach.1.33 EEDA and ERRRA commissioned Arup to produce a study on the identification and delivery of strategic employment sites in the Eastern Region. The study was published 23rd Nov 2009. The purposes of the study were to review current strategic sites (existing and planned) and to set out a new approach to future definitions, prioritization and delivery of such sites based on an understanding of future demand in order to inform LDFs. In our representations on the employment policies in the JCS we indicate the need to divide sites into strategic and sub-regional sites. The Arup study provides a useful definition of each that should be incorporated into the employment policies. The definitions are as follows:* Have good road and public transport access* A clear identity/brand and future vision for the site* Should accommodate development, which could not equally be accommodated elsewhere* Support specific sectoral need, e.g. knowledge based industries Key characteristics for Sub Regional Strategic Sites* Good quality sites, which are attractive to businesses with sub-regional focus* More likely to offer general employment space rather than sectoral* Good road and public transport access* Support wider RSS/RES objectives, such as regeneration or creation of sustainable communitiesG. Infrastructure Objections1.34 We are very concerned at the way in which infrastructure is dealt with in the JCSPS. The following are a summary of our concerns and these are pursued in separate representations on the infrastructure sections of the JCS:i. Critical dependencies need to be identified so that it is clear what is essential and what is desirable. The only reference to infrastructure dependencies are in paras 6.17 to 6.22 and most relate to road proposals and one far too general. ii. There is no table which indicates how infrastructure relates to the spatial strategy in detail. Appendix 8 (JCSPS p 112-133) is far too general in terms of costs and the application to major development areasiii. The first 5 years of the plan are critical and there is no indication in the JCS of what is needed, when and how it will be funded and how it relates to early development in the Trajectoryiv. There are no indications that key infrastructure partners are committedv. It is acknowledged that certain infrastructure, particularly towards the end of the RSS period will be less certain. There is no indication as to how uncertainty should be dealt with and what the consequences are of failure to provide key infrastructure and what the contingencies will be.vi. Some of the infrastructure agencies/suppliers have failed to provide information, notably British Gas. It is important to make clear those infrastructure authorities who have not performed. There is no indication of this in the JCS.vii. The plan currently simply summarises the existing infrastructure plans but fails to relate infrastructure to the effectiveness of the DPD. PPS12 says that infrastructure planning process should identify and have evidence for, amongst other matters, cost and funding sources. Viability evidence is needed to show that such an approach is realistic and capable of delivering the infrastructure at an appropriate time.1.35 At the moment the JCS provides a generalized and ambitious wish list of infrastructure projects with a broad and unrealistic costing. There is no indication of how viable the schemes are, how critical to the delivery of the plan and whether there is a reasonable prospect of implementing them. H. Strategic Gaps1.36 The JCSPS has been prepared on the basis of a fundamental misunderstanding of the policy on strategic gaps. The only strategic gaps that exist in the NPA are those between the City limits and the settlements that are nearest to the City limits, all falling within the South Norfolk part of the NPA. The strategic gaps were designated under Policy N6 of the Norfolk Structure Plan 1999. The purpose of the strategic gaps around Norwich was to protect the views and setting of the historic city and, in fact, they afforded this level of protection in place of the draft green belt policy proposed in an earlier draft of the Structure Plan.1.37 The JCSPS and the determination of its distributional strategy has proceeded on the basis that all gaps between main settlements are strategic gaps and have accorded strategic gap status and weight to land affected by such gaps and this has shaped locational proposals and the extent of development permitted in settlements affected by gaps.1.38 In the Norwich Common Appeal Decision the Inspector highlights the error the SNC made in relying on land between Wymondham and Hethersett being a strategic gap. It is in fact a countryside gap which, as previous Local Plan Inspectors have noted, could be modified once new housing needs are identified.1.39 The JCS refers to the importance of strategic gaps shaping the pattern of development in the NPA on page 8. On page 62, in reference to proposed development at Wymondham, reference is made to the strategic gap to the north and northeast of the town. Therefore, this must have

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been in the minds of the policy makers when determining the extent and location of development in Wymondham and, to this extent, the development potential of NE Wymondham. The extent of possible development needs to be revisited. 1.40 Reference is also made to the strategic gap affecting Hethersett and preventing development to the north and south west. The only strategic gap appropriate to consider at Hethersett is that between the City and Hethersett, which would affect development potential to the east of Hethersett, and between Hethersett and the City limits. 1.41 The objections A to H summarised in paragraphs 1.16 to 1.40 above are sufficient to render the plan unsound on the grounds of justification, effectiveness and consistency with national policy. 1.42 We request the authorities to withdraw and repair the JCS in respect of these points and reconsult before the JCS is considered at Examination. If the authorities do not act in this way we request the Inspector to give guidance on the matter at the earliest opportunity and to delay the JCS coming forward while these matters are resolved. 2.0

CONCLUSIONS 2.1 We summarise below the test which most relates to the appropriate objection. Topic / Objection / Test of Soundness Housing and Affordable Housing / 1. SHLAA evidence base has not informed JCS / Justification 2. Lack of justification for submitted option / Justification 3. Failure to deliver 5 year supply and 2021 RSS target / Effectiveness 4. Need more flexible / responsive housing land supply (see Norwich Common Appeal) / Effectiveness 5. Failure to deliver affordable housing needs. / Effectiveness Employment / 1. Failure to identify strategic and sub regional strategic employment sites in NPA / Effectiveness 2. Failure to identify key characteristics of regional strategic and sub-regional employment sites / Justification & Effectiveness Infrastructure / 1. Failure to identify critical dependencies on infrastructure / Justification 2. Failure to identify how infrastructure relates to the spatial strategy / Justification 3. Failure to indicate the commitment of infrastructure partners / Effectiveness 4. Failure to indicate uncertainties in the provision of infrastructure and the consequence and contingencies / Effectiveness Environment / 1. Spatial Strategy prepared on misguided premise that land at Wymondham and Hethersett is affected by strategic gap policy. / Justification and effectiveness

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O - 11398 - 8576 - 04 Spatial Vision and Spatial Vision objectives - i

11398 Object

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Respondent: Mr Richard Albert Harris [8576]

Agent: N/A

Full Text:

Summary: I do not agree that the Greater Norwich Development is required

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O - 11400 - 7172 - 04 Spatial Vision and Spatial Vision objectives - i, ii, iii

11400 Object

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Respondent: **Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172]** Agent: **N/A**

Full Text:

Summary:

Spatial Vision and Objectives - Section 4The claim that growth will be focussed on brownfield land in the Norwich urban area is not borne out by proposals to allocate substantial growth on greenfield sites.A high proportion of the development will occur on greenfield sites outside the built up area. The JCS relies on new road building to open up land for development in north-east Norwich and Long Stratton. This pattern of growth will also encourage high car dependency and yet no measures proposed for managing travel demand in other suburbs and rural fringes of Norwich and new growth areas.The detailed relationship between scale and location of growth and transport infrastructure will need to be tested at Public Examination.The JCS requires review in the light of the Climate Change Act 2008 and EEDA's transport carbon study (2009); the latter predicts a 33% increase in regional transport CO2 emissions between 2006 and 2031 as a result of RSS population, housing and economic growth unless tough transport and land use planning carbon reduction measures are adopted. The JCS support for a NDR is inconsistent with Objective 1 on Climate Change.Objective 7 - TransportSeveral part of the policy wording are not sound:- reference to the NDR, discussed elsewhere as being unsound.- reference to improved access via the road network is unsound with regard to reducing the need to travel, climate change and EEDA's transport carbon study findings.- internal inconsistencies within the Objective 7 policy wording e.g. encourage greater use of sustainable transport modes whilst at the same time improving road access such as the NDR.

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O - 11406 - 905 - 04 Spatial Vision and Spatial Vision objectives - iii

11406 Object

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Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Spatial Vision, Paragraph 1, page 22The ref to 'at least' 36740 new homes in para 1 is of some concern if it implies that some of the specific allocations in sensitive areas are subject to revision upwards. The SEA of allocations assesses the level of development identified in the COre Strategy policies for particular locations, not an unspecified level.

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O - 11409 - 905 - 04 Spatial Vision and Spatial Vision objectives - iii

11409 Object

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Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Spatial Vision Urban Area of Norwich p24RSS policy ENV6 Historic Environment identifies the historic city of Norwich as of special significance. Para 4 should be clear regarding the importance of protecting the important heritage assets and character of the city. the phrase 'contemporary medieval city' is ambiguous and misleading. Norwich is important for its archaeological record and later heritage as well as its medieval assets.

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O - 11410 - 905 - 04 Spatial Vision and Spatial Vision objectives - iii

11410 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Spatial Vision, Towns, villages and rural area, p25The main towns are of significant historic interest, and the substantial allocations proposed, particularly for Wymondham, could result in significant damage to character unless planned with the greatest care. The text should recognise that the character of these settlements should be protected and enhanced where possible. It is anomalous that the character of the key service centres is referred to, but not that of the main towns

Joint Core Strategy Proposed submission Document

S - 11434 - 8222 - 04 Spatial Vision and Spatial Vision objectives - None

11434 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Gladedale (Anglia) Ltd [8222]

Agent: RPS (Cambs office) (Ms Kathryn Money) [7662]

Full Text:

Summary: We support in principle the spatial vision in particular as it states that moderate levels of growth will take place in larger villages across the area.

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S - 11469 - 934 - 04 Spatial Vision and Spatial Vision objectives - None

11469 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

The East of England Plan, published in May 2008, set out the over-arching growth agenda for this region, which called for an additional 37,000 new homes in the Norwich Growth Area. In light of this sizeable allocation in an environmentally sensitive location, we believe that the GNDP is correct to preface this document with the admission that 'The scale of the challenges are immense'. We would endorse your implication, on page 6 of the document, that the environment presents the greatest challenge of all. We also believe that the document as it stands gives an honest appraisal of the local situation and we acknowledge that a very real challenge is presented to the GNDP by the 'unprecedented' (p.10) scale of growth imposed while being 'not yet fully geared up for delivery' (ibid). The aspirations of the strategy, to deliver growth in a sustainable way that complements the existing local character, with due consideration given to the future impacts of climate change, are laudable, but the real issue for Natural England remains over its practical implementation and its implications for the region's legally designated areas, within or outside the JCS boundary, which may be either directly or indirectly impacted. We concur with the point made in the document's introduction, that - since 'In many areas existing infrastructure is at, or near capacity ..., significant investment in green infrastructure waste and water infrastructure' are 'fundamental requirements' (page 11). Without them, it is clear that the scale of growth proposed is untenable, and would not meet the tests of the Habitats Directive. The findings of the draft Norwich Water Cycle Strategy indicate the degree to which growth in this region is dependent upon water supply and sewage disposal infrastructure being in place before development begins. The policies agreed in the East of England Plan make explicit the level of protection for European and internationally designated sites, and are the umbrella policies under which local core strategy policies sit. Therefore, the policies in the JCS should not repeat, but be compliant with the regional policies in order for the strategy to be sound. The key policies in the East of England plan which inform the JCS and are of relevance for the natural environment are listed below: East of England Plan (Revision of the Regional Spatial Strategy, May 2008) Policy ENV3 - Biodiversity and Earth Heritage. In their plans, policies, programmes and proposals, planning authorities and other agencies should ensure that internationally and nationally designated sites are given the strongest level of protection and that development does not have adverse effects on the integrity of sites of European or international importance for nature conservation. (page 55) East of England Plan (Revision of the Regional Spatial Strategy, May 2008) Policy WAT2 - Water Infrastructure. The Environment Agency and water companies should work with OFWAT, EERA and the neighbouring regional assemblies, local authorities, delivery agencies and others to ensure timely provision of the appropriate additional infrastructure for water supply and waste water treatment to cater for the levels of development provided through this plan, whilst meeting surface and groundwater quality standards, and avoiding adverse impact on sites of European or international importance for wildlife. (page 67) The key element here is the timely provision of the requisite infrastructure, without which growth would have adverse impacts on wildlife sites, and which would prevent the plan from becoming legally compliant. Therefore, we strongly support the wording of your Policy 3, which accords with this regional approach: 'The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development and to ensure that water quality is protected or improved, with no significant detriment to areas of environmental importance. ... This water infrastructure will be upgraded as required and be operational in time to meet the demands of any development.' (page 39) East of England Plan (Revision of the Regional Spatial Strategy, May 2008) Policy WAT3 - Integrated Water Management. Local planning authorities should work with partners to ensure their plans, policies, programmes and proposals take account of the environmental consequences of river basin management plans, catchment abstraction management strategies, groundwater vulnerability maps, groundwater source protection zone maps, proposals for water abstraction and storage and the need to avoid adverse impacts on sites of European importance for wildlife. (page 68)

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O - 11472 - 934 - 04 Spatial Vision and Spatial Vision objectives - ii

11472 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

The aspiration that 'people will use less water, the quality of water resources and the aquatic environment will be maintained or improved, and the risk of flooding will be avoided or mitigated' (page 22) is laudable, but a reduction in water use can only be framed as an aspiration, not a policy. Mechanisms to help people reduce their water consumption should be actively encouraged through forward planning, and exemplar developments such as Rackheath ecotown. Objective 1 on climate change includes the recommendation that 'New development will generally be guided away from areas with a high probability of flooding' (page 26). We would query the inclusion of the word 'generally' in this statement, as it seems unlikely that there will be an occasion where new development should be put forward in a high flood risk zone. We support the wording in Objective 9, particularly the driver for 'environmental gains' (page 28) over and above what is required to mitigate for impacts on designated nature conservation sites.

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O - 11497 - 8589 - 04 Spatial Vision and Spatial Vision objectives - i

11497 Object

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Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary:

The second point concerns the conflicts within the vision statement. It is clear that there is no consistency within the spatial vision as it affects segments of the Norwich Planning Area, which are under the control of different councils. This leads to a solution which places a very uneven loading on existing local communities and creates a serious problem for the provision of support services. Concentration demands a much greater investment in infrastructure and as an example of this problem the building of a major four lane highway, described as the Northern Distributor Route, tangential to the city will cost over £135 Million but do little to help city traffic flows merely creating extra journeys and increasing dependence on the motor car. This is in spite of the fact that the motorcar is being presented as a major contributor to climate change. The strategy describes this road as enhancing the living conditions of residents but as the route passes through the proposed housing settlements its effect will almost certainly be the opposite one. See Objective 1 Transport will be a significant problem with or without the NDR especially in those areas beyond the North East Development triangle. There seem to be no plans to improve local roads and access to both Wroxham and Norwich will become more difficult for residents in this area. The plan to rename Salhouse Station as Rackheath will avoid the construction of a second station but there remains a significant drawback to the plan to use the railway as a commuter tramway. The alternative to introduce buses, as rapid transit would appear to be flawed unless it is coupled with a scheme to provide them with priority access. In any case this would have to be at the expense of other users. Having created a car-based economy with out-of-town shopping malls it seems that there needs to be a more fundamental rethink of the transport policy in the city as well as the suburbs. Pedestrian and cycleway provision is welcome but it is limited by weather and distance to quite local use. The concentration of development in the Norwich North Eastern Sector will require a huge increase in infrastructure. Yet in other areas surrounding the city there are already more readily accessible road and rail networks. There appears for some reason a reluctance to utilise them. The areas which would be described in this way would be (a) the A47 corridor to the East of the city which is conjoined by a rail line with two spurs out towards Acle and Reedham and (b) the A11 Corridor to the south with two separate rail lines one to Diss and the other to Thetford. A historical pattern of development is quoted as a rationale for the expansion of the Norwich suburbs into the outlying villages North East of the City. The statement that the villages have taken a more urban form or are already subsumed into the urban sprawl is questionable. Yet in South Norfolk the opposite is claimed to be true. It seems to demonstrate unwillingness on the part of Broadland historically to protect the integrity of the villages around the City. Whatever is the case it is another example of lack of consistency in the strategy. The third point refers to the way the development in the Norwich Planning Area is to be concentrated in the so-called Growth Triangle. Development will be to the highest possible standard according to the highlights in the front of the document. There is no evidence that this will be the case when making the judgement using recent performance as a guide. The recent developments at Rackheath and Dussindale are just huge housing estates where there are no enhancing features that the Joint Core Strategy would have us believe are to be introduced with these plans. Previous promises about train stations, bus services and community facilities have been made before and failed to materialise because they are without the control of the Council. Using phrases like zero carbon and sustainable development are similarly promised but detailed reading shows that assertion being watered down within the text where lower standards are described even in the area of the so called eco-community. It is also clear that the building of 10,000 dwellings in the so-called growth triangle will completely destroy the unique countryside which exists to the North East of Norwich, which is wooded, Greenfield land and also a historic heath. The continuing reference to Rackheath as a disused airfield and ergo a Brownfield site is just wrong.

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O - 11501 - 8589 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11501 Object

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Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary:

The Planning Objectives

1. Objective 1 Minimise the contributors to climate change. There is no imperative in the strategy to require high standards of design or reduce greenhouse gases and it is unclear how this objective is to be assessed or met. Other than in the eco town the standards of building will remain less stringent until 2015 and the need to extend these higher standards to all building is in the hands of Government. The NDR will be a major contributor to climate change.
2. Objective 2 Allocate enough land for housing in the most sustainable settlements. The most sustainable settlements are arguably those that have been in existence historically and which would be enhanced by integrated development.
3. Objective 3 Promote economic growth and provide a wide range of jobs. The Strategy can only create an environment for the provision of jobs. It has been shown that Councils are not always successful in this endeavour.
4. Objective 6 Access to services. Electricity. There are a number of services, which are without the control of Planning Authorities. The provision of electrical energy is an example where the statement claims that the technical potential of renewable energy sources is over 160% of the area's current consumption. Presumably this is based on emerging technologies since only 10% is to be provided by onshore renewables. The CHP proposal for a Biomass plant remains embryonic but it will require the import of large volumes of fuel. It is envisaged that a plant will be built at Rackheath and whilst it has always been described as self-sustaining, this strategy suggests that it will provide grid power as well. This is not clearly laid out in the strategy. There may be implications for pollution in Salhouse but these are not flagged.
5. Objective 6 Access to services. Water. Access to water in underground storage is the usual method of provision. Increasing growth will increase this demand and it seems unlikely that the strategy proposed which is to restrict and re-cycle is practical. At Rackheath this year water pressure was so low that water to fight a fire had to be brought from the River Bure. To set standards which will be dictated by code and required to meet the regional water targets of a 25% reduction in water use are impracticable. It is not known how such a proposal will be monitored or policed but it is clear that water use is highly dependent on occupancy considerations. The strategy seems to make no reference to the provision of additional water supplies only that there is capacity to treat it.
6. Health. At the time of writing the NNUH has been on Black Alert for about three weeks. They are not due to review their strategic plans until April 2010 but are aware that there are real constraints on budgets in the Health Service and NHS Norfolk. Even if this were resolved next year and that seems unlikely, health facilities could be a limiting factor up to and beyond the middle of the next decade. The strategy states that the NHS will provide 28 extra beds between 2008 and 2026 but this number would be inadequate to meet the extra demand of these plans. So far as Broadland is concerned the earliest increment to NHS primary care facilities is 2016. The number of houses in the NHS papers are at least 10,000 more than those currently being shown in this strategy.
7. Education. There is a need to arrange education for up to 10,000 families in the development locations of Broadland and yet there is a totally unrealistic date for this of 2021. This is at odds with Objective 58.

Waste Management
The proposal to install a Waste Recycling plant at Rackheath when the present consultation on Waste plans state that no further waste facilities are to be provided.

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S - 11508 - 8591 - 04 Spatial Vision and Spatial Vision objectives - None

11508 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

The Leeder Family supports the Spatial Vision which states at page 25 that Long Stratton will see "more major housing growth and enhanced services. Long Stratton residents will also benefit from the enhanced quality of life resulting from a bypass." Significant positive outcomes arise from the inclusion of Long Stratton within Policies 9 and 10 of the PSD. We support the observation at page 8 of the Proposed Submission Document (PSD) that development of the area's market towns and larger villages "plays an important role in the strategy." Long Stratton is correctly described as a settlement providing a range of services, facilities and employment opportunities for residents. The description of the strategy at page 8 of the PSD notes that Long Stratton and Wymondham have a high degree of sustainability in their own right and have a greater independence from the city of Norwich. Given this context, we support the approach to the formulation of the Core Strategy described at page 9 of the PSD, namely that the GNDP has weighed in the balance "the findings of technical evidence against the preferences of local communities" expressed during the earlier consultation stages. The assessment has resulted in "a more dispersed pattern for locations in South Norfolk being proposed than the technical evidence alone would suggest. The strategy we have adopted reflects the existing local settlement pattern, promoting a scale of development that is appropriate to the size and function" of the settlements named. We agree with the GNDP that "this approach can help to secure a bypass for Long Stratton which is long held aspiration of residents and local councils." Paragraph 4.37 of PPS12 notes that core strategies have major effects and it is essential that they are based on through evidence. Part of the information underpinning the preparation of a core strategy is evidence of the views of the local community and others who have a stake in the future of the area. Accordingly, it is appropriate that the strategy proposed by the GNDP has taken into account the positive benefits of certain development proposals for local communities. The Leeder Family agrees with the comment at page 9 of the PSD that the pattern of growth in South Norfolk builds upon the existing infrastructure of the towns and villages. Concentrating all growth on the A11 corridor would result in the excessive expansion of Wymondham and Hethersett, not only altering the character of the settlements themselves but also eroding the degree of separation from Norwich.

Joint Core Strategy Proposed submission Document

S - 11509 - 8592 - 04 Spatial Vision and Spatial Vision objectives - None

11509 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Charles Birch (Trustees of the Trafford Trust Estate) [8592] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: Spatial Vision & key diagram Page 25 We concur with the identification of the role and function of the key service centres. These centres will be focal points for communities to have better access to quality jobs, healthcare, education and community facilities/shops. We acknowledge that the spatial vision envisages the accommodation of between 50 and 200 dwellings at the key service centres. We endorse the inclusion of Wroxham within the list of ksc's. We consider that Wroxham can accommodate 200 dwellings in accordance with the capacity of local services, community facilities and the provision of utilities. Given Wroxham's position we agree that it should form limited, but strong employment and tourism related links with the Norfolk Broads. We support content that Wroxham is identified as KSC. We support the GNDP's approach which recognises the important role that KSC's such as Wroxham can play in the wider implementation of the spatial strategy for the Norwich area.

Joint Core Strategy Proposed submission Document

O - 11510 - 1387 - 04 Spatial Vision and Spatial Vision objectives - iii

11510 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Diss Town Council (Ms. D Sarsons) [1387]

Agent: N/A

Full Text:

Summary:

Diss Town Council would like to comment on the soundness of the Joint Core strategy. The document cites Diss as an 'attractive market town' with the largest number of shops and services outside Norwich (6.36), acknowledges that it has a large rural catchment area which includes parts of north Suffolk and has good bus and rail links to London and Norwich. However it fails to make any provision for Diss and its hinterland, beyond the suggestion that a new water supply, new school places, 15ha of employment land and significant new shopping floor space will be provided or required. 1. In response to the early plans for the development of the south of Park Road as part of the Local Area Agreement for Diss, public and trader response suggests there is no desire for 'new shopping floor space' south of Mere Street. This is because the town centre economy is already struggling with the three large supermarkets and three significant electrical retailers on Victoria Road offering free parking. There is significant decline in the existing town centre, particularly St Nicholas Street/Market Hill area. The main factors for this are the direction of flow of traffic in Mere Street, poor signage to the town centre, expensive car parking charges, and the lack of investment or planning in highways infrastructure to improve traffic congestion on the A1066 through the town. In Appendix 2 supporting documents, there is a very strong indication of the amount of research for the Greater Norwich area, but nothing to suggest any reference to the rural economy including market towns apart from the South Norfolk Retail study 2004.2. There is no indication that there is an intention or a willingness on the part of the GNPD to develop joint plans with Mid Suffolk District Council for provision for Diss and its hinterland villages which do not just include Roydon and Scole but also Palgrave, Worham and many other villages in locality which look to Diss as their nearest town. It appears that because Diss suffers the misfortune of being a border town and therefore not part of the 'Norwich Policy Area', there is no proper consideration of the town's needs for the future to 2026. Officers' response to Brian Falk's comments on the JCS states 'I understand work is ongoing looking at transport, economic and environmental issues in Diss' and 'working in parallel is the South Norfolk Market Task Group which has been set up to address the means of stimulating the vitality and viability of South Norfolk's market towns including Diss'. It is clear to those who live, work and 'administer' in Diss that an holistic planning approach to the needs of Diss and its hinterland of 50,000 (including a significant proportion from the Mid Suffolk area), needs to be taken in order to ensure the sustainability and viability of Diss to 2026. This would require a multi-agency approach and should not be left just to South Norfolk Council but all authorities including the PCT, Norfolk County Council (education and transportation), Mid Suffolk District Council, Norfolk Constabulary and others. In the response it is further stated that 'This cross boundary issue with Suffolk has not come through strongly from any of the 3 consultations that supported the development of the JCS. It is also worth noting that, in the absence of a specific policy in the regional plan, housing provision figures cannot be re-distributed across boundaries.' However in the Government's PPS12 (which is referred to in the same response) at point 4.45 it states 'core strategies should show how the vision, objectives and strategy for the area will be delivered and by whom, and when. This includes making it clear how infrastructure which is needed to support the strategy will be provided and ensuring that what is in the plan is consistent with other relevant plans and strategies relating to the adjoining areas. This evidence must be strong enough to stand up to independent scrutiny. Therefore it should: (in particular) be coherent with the core strategies prepared by neighbouring authorities, where cross boundary issues are relevant'. Suggesting that (the) cross boundary issue with Suffolk has not come through strongly from any of the 3 consultations is irrelevant because it should have been considered in the development of the Core Strategy as outlined in Government Policy and not be reliant on responses from consultees to generate that level of investigation. It is appreciated that a significant amount of cross boundary work has been undertaken on Green Infrastructure, which while important does not address all the other issues relating to infrastructure. In its Core Strategy, adopted in Sept 2008 Mid Suffolk states (2.16) that 'Eye' is classified as a town... but its population of about 2,000 is less than that of some of the larger villages ... and ... is only about three miles from the larger town of Diss, in South Norfolk District, which has a greater range of shops and services and a main line railway station. There are a limited range of local services and shops in Eye and a large employment area at the adjacent Mid Suffolk Business Park, which the District Council has promoted as a means of improving employment opportunities for the northern part of the District (previously designated as a Rural Development Area). At 3.30, it states that 'The Council will cooperate in cross-border discussions that resolve the infrastructure needs of adjoining authorities whose services may be affected by future development in Mid Suffolk'. 3. Having studied the Government's PPS12 with regard to the 'Nature of Core Strategies', there is little evidence to suggest that the GNPD has followed this, specifically 4.4 in relation to delivery strategy. In the Implementation Framework at Appendix 7, there is not one single reference to Diss under the infrastructure delivery programme, which could suggest that no provision is intended to be made for Diss. Whilst it is acknowledged that Diss is not intended to be a significant growth location, the town has significant infrastructure needs that are not being met now, nor appear to be planned within the next 25 years. Expansion of the current medical centre in Diss has been needed and planned for many years, only delayed by the sourcing of funding, with full planning permission achieved over three years ago to provide additional medical services. This is not mentioned anywhere in the document. 4. Diss needs to be recognised as a separate and thriving growth zone with the acceptance of the need for the creation of a planning entity to develop an holistic planning approach for Diss and its hinterland.

Joint Core Strategy Proposed submission Document

O - 11518 - 8300 - 04 Spatial Vision and Spatial Vision objectives - iii

11518 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Phillip Jeans Homes Ltd [8300]

Agent: Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text:

Summary:

The spatial vision set out in Section 4 of the JCS sets out a clear distribution strategy for housing and employment and recognises the impacts of development on climate change, the environment, communities and transport. We support the objectives on pages 24 to 26 but feel they must be modified to reflect RSS objectives and policies and that those parts of the spatial strategy that are contrary to the objectives should be identified as follows: Objective 2 To allocate 'enough' land for housing. This must be changed to reflect RSS policies H1 and H2 to allocate 'at least' the targets expressed. It must also make clear that the target to meet is the RSS requirement at 2021 and not as suggested the target to 2026. The 15 year period for housing projections from the approval of the JCS is not the target date for housing. Objective 7: to enhance transport provision to meet the needs of existing and future populations while reducing travel needs and impact we support. Objective 12: To involve as many people as possible in new planning policy. We object this does not transfer to other sections of the plan and is not appropriately part of the spatial plan for the area. We suggest it is deleted.

Joint Core Strategy Proposed submission Document

O - 11534 - 8271 - 04 Spatial Vision and Spatial Vision objectives - None

11534 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Goymour Properties Ltd. [8271]

Agent: Andrew Martin Associates (Mr Michael Calder) [8498]

Full Text:

Summary:

With reference to Paragraph 3 of Spatial Vision Reasoned Justification: Whilst the principle of the Spatial Vision is supported, we have concerns about the 'soundness' of the Council's Spatial Vision. Planning Policy Statement 12 (PPS12) sets out that the examination of any Development Plan Document is concerned with matters of legal compliance and soundness. To be 'sound' a CS should be: * justified; * effective; and * consistent with national policy. To be "effective" the CS must be: (i) deliverable; (ii) flexible; and (iii) able to be monitored. It is submitted that the Spatial Vision is not "sound" as it is not "effective". The Spatial Vision is not "effective" for reasoning as follows: The third paragraph of text in The Spatial Vision identifies that development will be focussed in the Norwich urban area and in a very large mixed use urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle. It continues that other large-scale growth will take place at the expanded communities of Easton/Costessey, Cringleford, Hethersett, Long Stratton and Wymondham. The text is however lacking reference to the fact that the Norwich urban area also includes the fringe parishes surrounding the city. This is confirmed in Policy 12 titled 'The remainder of the Norwich urban area, including the fringe parishes'. Policy 12 makes clear that the fringe parishes are important to the delivery of the Spatial Vision by virtue of the significant growth planned in these areas by Policy 9: Strategy for growth in the Norwich Policy Area. Similarly, the Spatial Vision does not include reference to other large scale growth planned at Broadland and South Norfolk sites in the Norwich Policy Area. Therefore for the Spatial Vision to be "effective" we consider that the text in the third paragraph should be amended to include additional text, which highlights the strategic role the fringe parishes in the Norwich Policy Area, such as Hellesdon, will play in the delivery of the Spatial Vision. Similarly, there is a need to refer to the Spatial Vision strategy to focus development in Broadland and South Norfolk sites in the Norwich policy Area.

Joint Core Strategy Proposed submission Document

S - 11588 - 7653 - 04 Spatial Vision and Spatial Vision objectives - None

11588 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary: Refers to Spatial Vision - Objective 10 Norfolk Constabulary fully support Objective 10. The future built environment will be enhanced if all development is 'secure by design' as a planning environment.

Joint Core Strategy Proposed submission Document

O - 11613 - 1823 - 04 Spatial Vision and Spatial Vision objectives - i

11613 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

Planning Objectives

1. Minimise the contributors to climate change. There is no imperative to require high standards of design or reduce greenhouse gases and it is unclear how this objective is to be assessed or met.
2. Allocate enough land for housing in the most sustainable settlements. The most sustainable settlements are arguably those that have been in existence historically and which would be enhanced by integrated development.
3. Access to services. There are a number of services which are without the control of Planning Authorities. The provision of electrical energy is an example where the statement claims that renewable energy is over 160% of the area's current consumption. On investigation this is only seen as the technical potential. Presumably this is based on emerging technologies but only 10% is to be provided by onshore renewables. The CHP proposal for a Biomass plant remains embryonic but it will require the import of large volumes of fuel. It is envisaged that this plant will be built at Rackheath and whilst it has always been described as self sustaining this strategy suggests that it will provide grid power as well. This is not clearly laid out in the strategy. There may be implications for pollution in Salhouse.
4. Water provision at Rackheath is to be dictated by code and they will be required to meet the regional water targets of a 25% reduction in water use. It is not known how such a proposal will be monitored or policed but it is clear that water use is highly dependent on occupancy considerations.
5. Health. At the time of writing the NNUH has been on Black Alert for about three weeks. They are not due to review their strategic plans until April 2010 but are aware that there are real constraints on budgets in the Health Service and NHS Norfolk. Even if this were resolved next year and that seems unlikely, health facilities could be a limiting factor up to and beyond the middle of the next decade. The number of houses in the NHS papers are at least 10,000 more than those currently being produced by councils.
6. Schools are needed for up to 10,000 families in the development locations. - No firm commitment to ensure infrastructure improvements timed to be in ahead of development (only lots of fine words). - The need for adequate water supplies has been recognised, but no indication of how this will be achieved, let alone the timing. Recycling and reducing consumption is not enough. - All discussion refers to young families and jobs, there is no mention of older people, we are facing a 'grey bulge' with the aging population, the pattern and type of growth does not take them into account. - Public transport patterns are still radiating from Norwich (eg. Bus Rapid Transit routes), we have employment areas at the Airport and Broadland Business park, how will these link to housing, with or without NDR.
- d) The lack of a plan 'B' in the event the NDR does not go ahead is an inexcusable weakness. IF all these new homes are needed, they will still be needed if the NDR does not go ahead.
- e) The Norfolk area is not the best choice, South Norfolk has far greater access to main roads.
- f) Concern that plans do not seem to have been considered for a new bypass at Wroxham/Hoveton. These remarks are designed to test this document for "soundness" and it is felt that it fails on all counts.

Joint Core Strategy Proposed submission Document

O - 11615 - 8127 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11615 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Swannington with Alderford & Little Witchingham Parish Council (Mr Steve Griggs) [8127] **Agent:** N/A

Full Text:

Summary:

The Parish Council still questions the soundness of the rationale underpinning the assumptions that are driving the JCS. What evidence is there, for example, that there will be a requirement for 40,000 new homes and 35,000 new jobs in this region by 2020? Do we envisage the current population, and numbers of unemployed, rising by the year 2020 to fuel the demand, or are we planning large-scale "migration" into the region to create demand? We are certainly not convinced that the envisaged "unprecedented high level of growth and change" will be beneficial to the region. It is hard to see how this level of growth can be absorbed and sustained in the longer term. We have ample evidence in Britain over the years where headlong growth has faltered and left a legacy of decline. Indeed, we are currently suffering an economic down-turn that is impacting directly on key industries in the region with growing numbers of residents being made redundant. We do acknowledge that there needs to be some continuing growth to sustain services and facilities, but it needs to be well-managed and sustainable to avoid over-reaching ourselves and damaging the character of the region. Surely the strategy should be to preserve the current levels of employment (with modest, natural, growth) rather than seeking to create an unprecedented high level of jobs, which cannot be satisfied from within the region without importing workers from outside the region?

Joint Core Strategy Proposed submission Document

S - 11624 - 7523 - 04 Spatial Vision and Spatial Vision objectives - None

11624 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

S - 11641 - 8610 - 04 Spatial Vision and Spatial Vision objectives - None

11641 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Royal London Mutual Insurance Society Limited Agent: Savills(Manchester) (Mr Tim Price) [4303]
[8610]

Full Text:

Summary: The Spatial Vision - (Page 22)We support the GNDP's Vision that investment within the Longwater area will assist in creating a stronger economy.Objective 3 - To promote economic growth and diversity and provide a wide range of jobsWe support the GNDP in its acknowledgement of the role that retail development plays in the promotion of economic development and job creation (and this accords with the thrust of emerging national planning policy contained within the consultation paper: PPS 4: Planning for Prosperous Economies). In addition, we support the comments that Longwater will be a focus for further growth in employment provision.

Joint Core Strategy Proposed submission Document

S - 11646 - 4685 - 04 Spatial Vision and Spatial Vision objectives - None

11646 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Mr Peter Adams [4685]

Agent: Tetlow King Planning (Ms Rachel Coles) [8611]

Full Text:

Summary:

We support the planning objectives as follows: Objectives 3: Economic growth New developments which are designed to meet the needs of older people can generate jobs for local people which are flexible and can be fitted in around family life. Objective 6: Access to services There is a need to increase access to services, this is a very important aspect of life for older people. Social isolation and inaccessible services lead to a poor quality of life for many older people. Continuing Care Retirement Communities which provide care, accommodation and on site facilities offer the opportunity for older people to live within a supportive community and in close proximity of many services to meet their daily needs. Objective 10: People feel safe in their community Older people are especially prone to feeling more vulnerable in their own home. A Continuing Care Retirement Community provides a safe and secure community within which they can feel at home and know that there are neighbours who they can call on. Objective 11: Healthy and active lifestyles As people age they do not necessarily want to or need to stop leading active lives. Particularly as the more recent retirees are still very active and like to use the gym and play bowls, croquet etc. This should be encouraged through the provision of leisure facilities within and close to developments of care and accommodation for older people.

Joint Core Strategy Proposed submission Document

O - 11650 - 8366 - 04 Spatial Vision and Spatial Vision objectives - i, ii

11650 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. The BLT supports the statement that growth will be focused on brownfield land and in a very large mixed use urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle (page 22). Previously, the BLT have commented that whilst it is considered laudable to aim for zero carbon development, this needs to be considered in the context of the Government's timetable, which seeks private developers to achieve zero carbon development by 2016. This needs to be reflected in the spatial vision (bullet point 3, page 22). As the GNDP have not provided any response to the representations to the regulation 25 consultation, the BLT are not aware of reasons why this has not been included. It is considered that if the constituent local planning authorities (LPAs) of the GNDP were to seek zero carbon on each development scheme, this may result in schemes not coming forward due to reasons of viability. As such, this would impact on the delivery of the Core Strategy and therefore its soundness. However, it is considered that simple wording changes, which suggest that developers should aim to achieve zero carbon development rather than it being interpreted as a requirement would resolve this. In previous representations, the BLT have made representations, asking that the Core Strategy acknowledges that in areas of major growth, there will be a significant shift in the character of these areas from urban fringe towards becoming a set of neighbourhoods within the fabric of the city. This will need to be recognised in developing well considered landscape strategies for these growth areas to support the respective objectives of biodiversity, landscape amenity, the support of healthy lifestyles, creation of a valuable setting for development and general quality of life. Areas of particular landscape/ecological interest will be retained and enhanced through development. There will also be areas that have little or no interest in this regard, and the Core Strategy should recognise that these areas may be more appropriately used to accommodate growth albeit within a well conceived landscape framework that may reconfigure the landscape to support the objectives set out above. This should be reflected in objective 9 as if this objective is interpreted in a way which results in the blanket protection of all open landscape in the Norwich Policy Area, this could have a significant impact on the delivery of the strategy. The advantage of large scale development is the ability to create new landscapes and areas that will support and enhance bio-diversity for future generations to enjoy.

Joint Core Strategy Proposed submission Document

O - 11662 - 8511 - 04 Spatial Vision and Spatial Vision objectives - i, ii, iii

11662 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

We object to the Spatial Vision's identification of Long Stratton as a location for 'major housing growth', and the identification of the Long Stratton bypass in the 'Working and Getting Around' section. The Vision identifies the Long Stratton bypass along with the proposed Northern Distributor Road (NDR) for Norwich. However, while the Vision is able to set out the benefits the NDR will bring, it does not set out any strategic benefits related to the Long Stratton bypass. Under the 'Towns, villages and the rural area' heading, the Vision makes reference to the local environmental benefits the bypass would bring. However, it does not mention any of the inevitable negative effects. We have set out our objections to the proposed development in Long Stratton, and the accompanying bypass, in greater detail in our representation on Core Strategy Policy 9. In summary, we believe that it will lead to: * A general increase in car use, which will in turn lead to an increase in carbon emissions, and greater congestion on roads which are already near to capacity. * The diversion of scarce funding for infrastructure away from projects which have the potential to be of far greater benefit to a greater number of people, such as the creation of a Bus Rapid Transit service for the A11 corridor. * Long Stratton will also remain isolated from sources of employment, and it seems unlikely that new development there would be supported by sufficient new services and infrastructure, given both uncertainty over funding and the high cost of constructing the bypass. * There does not appear to be any evidence in support of the need for development in the town, other than in order to fund a bypass. Given our concerns, we feel that the identification of development in Long Stratton, and the proposed bypass in the Vision is in conflict with some of its other statements. For instance, it claims that by 2026: 'People will have access to good quality jobs and essential services and community facilities, with less need to use the car.' 'New and expanded communities will be highly sustainable with good access to local jobs and strategic employment areas and will be served by new or expanded district and local centres providing shops, health, education, services and facilities easily accessible by foot, bicycle and public transport.' We believe that these aims cannot be achieved if development and a bypass are located at Long Stratton, and we are particularly concerned with regard to the second quote. It appears that the high cost of the bypass will result in a reduction in the other essential infrastructure which can be delivered in Long Stratton. In its summary of the three growth options tested, the Sustainability Appraisal suggests that the 'Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.' (SA, page 39). In contrast, the Vision implies that this will not be the case. We are therefore concerned that the Vision is not only inconsistent with the recommendations made by the Sustainability Appraisal, but in fact makes statements which are contrary to its conclusions. In addition, there does not appear to be any evidence to demonstrate that the 1,800 homes proposed for Long Stratton would be sufficient to fund both the proposed bypass and the substantial infrastructure required to support them. The Infrastructure Topic Paper notes that while the cost of the bypass would be an estimated £35 million, the total cost of the necessary infrastructure for Long Stratton would be £112 million. As noted above, we believe that this money could be better spent on additional growth in more sustainable settlements, such as Wymondham. We propose that the Vision should be amended to accord with 'Option 1', as tested by the Sustainability Appraisal, which essentially moved the proposed 1,800 dwellings from Long Stratton to add to Wymondham's total. The SA concluded that this would be a more sustainable form of development. Due to the concerns raised above and in our other representations, and the conclusions of the SA, we believe that the Core Strategy may be found unsound if the proposed development is to be located in Long Stratton.

Joint Core Strategy Proposed submission Document

O - 11663 - 8511 - 04 Spatial Vision and Spatial Vision objectives - ii

11663 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

We are concerned that the Key Diagram has the potential to be misleading, due to the way that it represents housing and employment sites. The different coloured hemispheres which represent housing and employment allocations in the larger settlements appear to represent spatial allocations, suggesting that employment will be on the northern side of these settlements, and housing to the south. We believe that, for instance, concentric rings of colour, could be less confusing.

Joint Core Strategy Proposed submission Document

S - 11677 - 8270 - 04 Spatial Vision and Spatial Vision objectives - None

11677 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Henderson Retail Warehouse Fund [8270]

Agent: Savills(Manchester) (The Manager) [8269]

Full Text:

Summary:

We write on behalf of our client, Henderson Retail Warehouse Fund (HRWF) owners of Riverside Retail Park, Norwich. We have previously made representations on the Core Strategy in a letter, dated 30 April 2009 and the Greater Norwich Development Partnership (GNDP) Allocations Development Plan Document (DPD) on 17 April 2009. The purpose of this letter is to make representations on behalf of HRWF in relation to the comments in the Core Strategy. We confirm our request for this letter to be read in conjunction with the representations made previously. We'd like to take the opportunity to confirm our support for the GNDP's proactive approach to guiding, managing and delivering growth in the Core Strategy. We consider that on the whole, the policies contained within the Core Strategy will achieve its objectives. Objective 3 We support the GNDP in its acknowledgement of the role that retail development plays in the promotion of economic development and job creation. This accords with national government guidance in the consultation paper, PPS4: Planning for Prosperous Economies.

Joint Core Strategy Proposed submission Document

S - 11700 - 8363 - 04 Spatial Vision and Spatial Vision objectives - None

11700 Support

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary: Taylor Wimpey Development and Hopkins Homes agree with page 23 of the PSD regarding access to suitable housing. Para 13.68 of the East of England Plan states that the Norwich area has the potential to develop further as a major focus for long term economic development and growth. In the light of this policy perspective, it is important to ensure that the JCS provides a robust and flexible spatial strategy, capable of realising the potential of the Norwich area in the period to 2021 and beyond. The JCS should secure the base from which the necessary step-change in housing delivery is achieved in the short/medium term whilst identifying a sound spatial policy framework for the longer term. The GNDP will be aware that our clients control land to the west of the present Lodge Farm development site on the southern side of Dereham Road at Costessey. They can make a meaningful contribution to the early delivery of the new housing required in the Norwich area by virtue of Polices H1 and NR1 of the East of England Plan. We support that part of the Spatial Vision which anticipates a number of locations for planned urban extensions, including Costessey. Further housing to the west of Lodge Farm will be highly sustainable with good access to the strategic employment at Longwater and the job opportunities at Bowthorpe.

Joint Core Strategy Proposed submission Document

O - 11709 - 8607 - 04 Spatial Vision and Spatial Vision objectives - None

11709 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that the limitation of 300 dwellings only at Aylsham is founded on nothing but a cursory consideration of an arbitrary division of housing requirement figures and infrastructure capacity analysis, specifically sewage. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth in Aylsham is provided. Our client's land interest is the site at Sir Williams Lane, Aylsham which is capable of accommodating up to 500 dwellings and supporting infrastructure. By limiting the scale of growth at Aylsham to 300 dwellings the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.

Summary: Objective 2 We support the spatial objectives listed in page 24 - 26 of the JCS but are of the view that Objective 2 must be modified to reflect RSS objectives and policies more accurately. Objective 2 states that the GNDP is obliged "To allocate enough land for housing". This must be changed to reflect RSS Policies H1 and H2 to allocate AT LEAST the targets expressed. It must also make clear that the target is to meet the RSS requirements at 2021 and not as suggested the target to 2026. The 15 year period for housing projections from the approval of the JCS is not the target date for housing.

Joint Core Strategy Proposed submission Document

O - 11712 - 8618 - 04 Spatial Vision and Spatial Vision objectives - iii

11712 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

We are concerned that the Spatial Vision is not backed up by any sense of achievability, despite the GNDP's conviction that it expresses "communities' local aspirations." Further, although the DPD is not intended to be site specific, it clearly is site specific with locations such as Rackheath, Easton/Costessey, Cringleford, Hethersett, Long Stratton and Wymondham identified for growth. It is intended that "zero carbon development" will be achieved yet there is no sense of what this means in terms of definition or the costs of provision. Objective 2 The opportunity to achieve housing, employment and services to be planned so they are grouped together has not been taken in the case of South Norfolk's contribution to the JCS. We expand on this in other representations. Objective 5 Whilst expressing laudable community aspirations such as everyone having access to suitable housing; having healthy, safe and fulfilling lifestyles and high standards of healthcare, etc., there is little prospect of a DPD ensuring this can happen in any particular area. Achievement depends on the actions of others and without commitment as to how this might be attained is little more than an aspiration and a development plan should not aim to advertise delivery of such goals if there is nothing with which to back it up. Objective 7 of the Spatial Vision states that the location and design of development will reduce the need to travel especially by private car. Implementing new road proposals such as the NDR and the Long Stratton Bypass will encourage increased car usage enabling it to be a simpler option. The two intentions are not considered to be mutually compatible. We do not see how "rural isolation" will be reduced by improving transport networks and encouraging new communication and information technologies. Rural population levels are unlikely to increase to the point where enhanced rural public transport provision will become any more viable than at present. This will not necessarily help elderly people and will not engender social interaction. Objective 10 states there will be reduced crime but there is no explanation as to how this will be achieved.

Joint Core Strategy Proposed submission Document

O - 11731 - 8607 - 04 Spatial Vision and Spatial Vision objectives - None

11731 Object

CHAPTER 4 04 Spatial Vision and Spatial Vision objectives

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that up to 250 dwellings should be allocated at Mulbarton. Presently the settlement is earmarked for between 10 - 20 dwellings as it is classified as a Service Village under Policy 15 of the JCS. We consider this figure is founded on nothing but a simple averaging exercise rather than a considered approach to capacity. The submitted JCS does nothing to explain why the housing figures in Policy 15 have been divided in this way and no reasoned justification for the proposed level of growth within these Service Villages. We believe there should be two levels of Service Village, Minor and Major. The Minor Service Villages have extremely limited services and should not receive any growth, whilst the Major Service Villages such as Mulbarton should receive a much higher allocation. Furthermore the 1,800 dwellings to be allocated to smaller sites in South Norfolk should be taken into consideration, meaning Major Service Villages such as Mulbarton should receive in the region of 250 dwellings.

Summary: Objective 2 We generally support the objectives on pages 24 to 26 but consider Objective 2 must be modified to reflect RSS objectives and policies as follows: Objections to Spatial Objectives Objective 2: To allocate "enough" land for housing. Objection: This must be changed to reflect RSS Policies H1 and H2 to allocate "at least" the targets expressed. It must also make clear that the target to meet is the RSS requirements at 2021 and not as suggested the target to 2026. The 15 year period for housing projections from the approval of the JCS is not the target date for housing

Joint Core Strategy Proposed submission Document

O - 11169 - 8481 - Policy 1: Addressing climate change and protecting environmental assets - ii

11169 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Broads Authority (Ms Andrea Long) [8481]

Agent: N/A

Full Text:

The JCS is supported by a Green Infrastructure Study and makes provision for strategic green information in key locations. To prevent adverse impacts from increased demand for natural resources, visitor pressure and general disturbance from increased population closer to sensitive sites, growth will need to be supported by extensive areas of new green infrastructure of a scale and type that will provide alternative destinations for leisure trips. While it is not possible to define precise requirements at this stage, it is clear that significant investment will be required to ensure no adverse effect on the considerable number of SACs, SPAs and Ramsar sites in and around the Broads Area. Green infrastructure provision needs to address a number of issues and be multi-functional. There is a need for strategic areas to provide biodiversity and ecological benefits as well as the need to provide recreational opportunities e.g. diverting visitors from the most sensitive locations and providing a genuine alternative experience as well as local needs in terms of dog walking and localised recreation such as ball games. The JCS evidence base needs to have a clearer understanding of where people do go to recreate and how this relates to car use and travel patterns more generally. At present this is a weakness of the Appropriate Assessment. In addition there are no mechanisms to enable funding to improve some less sensitive sites with a view to using them to attract visitors away from more sensitive sites. Currently the JCS doesn't adequately address this issue but it could be achieved if a mechanism was in place to fund it. The Broads Authority would not wish to dissuade visitors from visiting or using the Broads as it is a core purpose of the Authority.

Summary:

There needs to be serious consideration given to the provision of adequate scale and type of green infrastructure. This needs to be properly funded and in place at the earliest possible opportunity. The issue should not be peripheral but integral to the planned growth.

Joint Core Strategy Proposed submission Document

O - 11300 - 8260 - Policy 1: Addressing climate change and protecting environmental assets - None

11300 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary:

Policy 1 is now the policy which is intended to enact Objective 9. This policy includes biodiversity sustainability and so ought also to include geodiversity sustainability. We request that geodiversity sustainability be included within policy 1. (See PPS9). (I should point out that protecting minerals and other natural geodiversity is not the same as "...protecting minerals and other natural resources..." Geodiversity like biodiversity has value in its own right.) 5.4 does correctly incorporate geodiversity, so please reflect this in the wording of the policy itself.

Joint Core Strategy Proposed submission Document

O - 11301 - 8260 - Policy 1: Addressing climate change and protecting environmental assets - None

11301 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary: 5.10 concerns the Norwich Fringe area. Geodiversity is of significance here as well as biodiversity and should be included within this paragraph. (The Chalk is close under the surface; the Norwich area marks the inland extent of the Crag sea; there are several glacial tills; and the Broadland peats reach up to the eastern fringe. It is this diversity of the geology combined with the erosive action of the rivers which produces the variety of landscape types which converge at Norwich.)

Joint Core Strategy Proposed submission Document

O - 11319 - 6826 - Policy 1: Addressing climate change and protecting environmental assets - i, ii

11319 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

The policy lacks any framework which sets out the contribution made by various sectors to carbon dioxide emissions, and thereby can make no evaluation as to what measures might best be adopted for each sector to seek reductions in levels. The basic information is available, and has been discussed in the context of an eco-town at Rackheath. It should now be applied to existing as well as new development. Although the JCS uses words such as 'minimise' and 'efficient', this is not a replacement for a coherent and targeted approach that relates to the size of the problem in each sector and how it is addressed. Instead of this coherent approach, much of the text relates to protecting environmental assets and much of that carries an obligation irrespective of climate change. In one case, the fragmentation of habitats, it becomes yet more critical with the advent of climate change. Water resource, also a critical issue, gets only one mention, with the hope that the JCS will 'minimise water use and protect ground water resources'.

Joint Core Strategy Proposed submission Document

O - 11331 - 8570 - Policy 1: Addressing climate change and protecting environmental assets - ii

11331 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 1 fails the Effective soundness test because it is inconsistent with the spatial strategy, particularly as it relates to South Norfolk. Reasons: Hethersett Land Ltd notes that Policy 1 requires (inter alia) that all development will be located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather. It has a specific requirement to reduce the need to travel and give priority to low impact travel modes. Hethersett Land Ltd contends that it can be demonstrated that this approach can be best achieved by planning strategic development at locations on the edge of existing settlements. The level of development needs to be of a size sufficient to provide the infrastructure, facilities and services needed to help address climate change and protecting environmental assets. The GNDP's own evidence (as highlighted in other representations) helps to demonstrate this. For instance, the County Council's Public Transport Team have suggested in its response to the Favoured option that the level of growth needs to be beyond the 1000 - 1800 planned at the South Norfolk strategic growth locations, in order to justify the public transport facilities needed to affect a step change in modal shift away from private motor car. Hethersett Land Ltd therefore suggests that Policy 1 is inconsistent with the JCS's spatial strategy, particularly the South Norfolk growth dispersal strategy. If the Spatial Strategy is implemented in the way it is currently set out, it will not be possible to achieve the policy's requirement to minimise the need to travel and give priority to low impact travel because growth will be located in dispersed settlements in South Norfolk where the only viable travel mode is the private motor car. It is interesting to note that although Policy 1 is concerned with the location of development it is acknowledged that it does not contribute to objective 7, reducing the need to travel. Presumably because the growth dispersal strategy for South Norfolk's would not lead to a reduction in travel.

Joint Core Strategy Proposed submission Document

O - 11411 - 905 - Policy 1: Addressing climate change and protecting environmental assets - iii

11411 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 1 Climate change and environmental assets, p32We welcome the final paragraph addressing the historic environment. However, we consider that the policy should also address the settings of conservation areas.

Joint Core Strategy Proposed submission Document

O - 11413 - 905 - Policy 1: Addressing climate change and protecting environmental assets - iii

11413 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 1, para 5.4Amend para5.4 to indicate how Conservation Area Appraisals will be used to support judgements

Joint Core Strategy Proposed submission Document

O - 11414 - 905 - Policy 1: Addressing climate change and protecting environmental assets - iii

11414 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: policy 1 References, p34

Joint Core Strategy Proposed submission Document

S - 11473 - 934 - Policy 1: Addressing climate change and protecting environmental assets - None

11473 Support

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary: Area-wide policies We acknowledge with thanks your re-wording of the bullet point (page 32) under sites not protected through international or national designations, recognising their vital contribution to a sustainably biodiverse environment for the county. The wording in this section on the importance of ecological networks is particularly effective at embedding this concept in the whole agenda for growth, and we welcome its inclusion

Joint Core Strategy Proposed submission Document

O - 11581 - 7738 - Policy 1: Addressing climate change and protecting environmental assets - ii

11581 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Anglian Water (Mrs Sue Bull) [7738]

Agent: N/A

Full Text:

Summary:

The draft Water Cycle study stage 2b report has identified significant constraints to the proposed development allocations on grounds of environmental capacity (predominantly water quality and in some cases volumetric). The proposed development can be accommodated at our WWTWs subject to the Environment Agency granting increase volumetric consent. This of course is subject to phasing and funding where long term sustainability needs to be taken into account. The main constraint would be in achieving the tight sanitary consents which would come with the increased volumetric consents, some of which have already been indicated as beyond best available technology. These tightened sanitary consents could possibly be achieved but at excessive costs. Policy 1 and 3: A policy of surface water separation needs to be adopted on all new developments and it needs to be reinforced that any new highway drainage does not enter into Anglian Water's network system.

Joint Core Strategy Proposed submission Document

O - 11597 - 8203 - Policy 1: Addressing climate change and protecting environmental assets - ii

11597 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Country & Metropolitan Homes - formerly Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes' opinion is that Policy 1 fails the Effective soundness test because it is inconsistent with the spatial strategy, particularly as it relates to South Norfolk. C&M Homes notes that Policy 1 requires (inter alia) that all development will be located and designed to use resources efficiently, minimise greenhouse gas emissions and be adapted to a changing climate and more extreme weather. Policy 1 has a specific requirement to reduce the need to travel and gives priority to low impact travel modes. It can be demonstrated that this approach can be best achieved by planning strategic development at locations on the edge of existing settlements, such as Hethersett. The level of development needs to be of a size sufficient to provide the infrastructure, facilities and services needed to help address climate change and protecting environmental assets. The GNDP's own evidence helps to demonstrate this. For instance, the County Council's Public Transport Team has suggested in its response to the Favoured option that the level of growth needs to be beyond the 1000 - 1800 planned at the South Norfolk strategic growth locations, in order to justify the public transport facilities needed to affect a step change in modal shift away from private motor car. This further emphasises that the current allocation of development at Hethersett of 1,000 units should be considered a minimum and early releases of smaller levels of development (up to 200 units) could be sustained within current environmental constraints and form part of the 1800 unit allocation to South Norfolk smaller sites within the NPA. Locating these within more sustainable settlements such as Hethersett enables the overarching spatial strategy to be achieved through sustainable development. Otherwise the cumulative effect could be an allocation of 1800 units dispersed sporadically across South Norfolk sites within the NPA of insufficient scale to sufficiently contribute to the physical and social infrastructure requirements of the area. C&M Homes therefore suggests that the JCS's spatial strategy, particularly the South Norfolk growth dispersal strategy is inconsistent with Policy 1. If the spatial strategy is implemented in the way it is currently set out, it will not be possible to achieve the requirements of Policy 1 to minimise the need to travel and give priority to low impact travel because growth will be located in dispersed settlements in South Norfolk where the only viable travel mode will predominantly be the private motor car. The scale of development proposed in a dispersed strategy will not be sufficient, as supported by evidence, to result in public transport improvements. C&M Homes suggest that Policy 1 can only be achieved with a more concentrated strategy of growth around the City of Norwich where the largest number of job opportunities exists and infrastructure is in or can be delivered to offer sustainable modes of transport and accessibility in locations such as Hethersett. C&M Homes contends that early release of smaller sites within settlements like Hethersett which could generally accommodate up to 200 units in accordance with the emerging Spatial Vision for Hethersett will be required to maintain deliverable housing land in addition to the anticipated strategic growth. This will help provide the scale and quantum of development required to achieve sustainable development in accordance with the capacities of local services, community facilities and utility provision.

Joint Core Strategy Proposed submission Document

S - 11625 - 7523 - Policy 1: Addressing climate change and protecting environmental assets - None

11625 Support

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development. The JCS presents an ambitious plan for a multi-functional network of green spaces and links. The network will require significant co-ordination to link fragmented habitats. There could be potential for agri-environment schemes to be linked with this network. While further detail will be for further development plan documents to deliver, the implementation framework does clearly set out how this network will be developed. The possibility of combining waste management with production of renewable energy should be promoted as proposals are developed. Policy WM8 advises local authorities to introduce innovative waste management schemes, particularly within growth areas, within new development.

Joint Core Strategy Proposed submission Document

O - 11682 - 8352 - Policy 1: Addressing climate change and protecting environmental assets - iii

11682 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary:

We note that bullet point 4 of this policy states that development will "be located to minimise flood risk mitigating any such risk through design and implementing sustainable drainage". We fully support the inclusion of flood risk as a principle factor in the location/design of development. A large number of the general locations proposed for residential development as well as a number of the locations proposed for employment growth (as set out in the Policies for Places) have an element of flood risk associated with them. This could potentially conflict with paragraph 6.13 of the Joint Core Strategy (JCS) which states that growth locations have been selected because they are not at risk of fluvial flooding. However, we note that paragraphs 6.29, 6.46, 6.51 and 6.56 make reference to the flood risk associated with Norwich City Centre, Acle, Loddon and Wroxham respectively, specifically the environmental constraint that flood risk poses. With particular reference to the City Centre, 3000 dwellings and 100,000m² of new office floorspace is proposed. Paragraphs 14-16 of Planning Policy Statement (PPS) 25: Development and Flood Risk require that a Sequential Test is undertaken as part of the planning process. We acknowledge that large proportions of most growth areas lie within Flood Zone 1 (the low risk zone) and that the Sustainability Appraisal makes some reference to use of the Strategic Flood Risk Assessment in the determination of growth areas. However, no clear evidence has been provided within the consultation package to demonstrate that the Sequential Test has been undertaken, or that the proposed growth is able to be located wholly within the extent of Flood Zone 1. There is great emphasis within PPS 25 placed upon the need to locate development within areas at lowest flood risk. We feel that currently the Core Strategy does not go far enough in ensuring this approach will be applied when sites are allocated or put forward for development within subsequent DPDs.

Joint Core Strategy Proposed submission Document

O - 11713 - 8618 - Policy 1: Addressing climate change and protecting environmental assets - ii

11713 Object

CHAPTER 5 Policy 1: Addressing climate change and protecting environmental assets

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary: Policy 1: Addressing Climate Change and protecting environmental assets We question the implementability of a policy which requires the use of locally sourced materials. This has clear consequences for the cost of development. For example, it is well known that the UK is unable to grow timber in quantities and of an appropriate quality to be used in timber frame construction, itself a highly sustainable option. Timber used in such constructions comes from either Scandinavia or North America. The inability to source this locally on cost grounds alone means that sources further afield have to be investigated. On economic grounds alone this is a necessity. A further example is reed used for thatch. Supplies of reed now used locally tend to be from China or Eastern Europe as locally grown supplies are not commercially competitive.

Joint Core Strategy Proposed submission Document

O - 11332 - 8570 - Policy 2: Promoting good design - i, ii, iii

11332 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that JCS Policy 2 fails the Justified, Effective and National Policy soundness tests because elements of it are not founded on robust and credible evidence, it cuts across other legislation such as building regulations and it is inflexible as it seeks to impose a current standard for the entire plan period.

Reasons: Hethersett Land Ltd considers JCS Policy 2's requirement for residential development to achieve buildings for life criteria silver standard (bullet point 12) to be unsound because: 1. the requirement is not consistent with national policy, it adds a further requirement beyond building regulation. 2. It is not underpinned by any evidence that it is viable and therefore deliverable. 3. It is inflexible because it seeks to impose a standard now, for the entire plan period of the plan. There is no evidence to suggest that this standard will be appropriate for the period up to 2026 or indeed whether the standard will still be relevant.

Joint Core Strategy Proposed submission Document

S - 11386 - 8595 - Policy 2: Promoting good design - None

11386 Support

CHAPTER 5 Policy 2: Promoting good design

Respondent: Mr Charles Birch (Trustees of the Gurloque Settlement, et al) [8595]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We concur with the observation at paragraph 6.30 of the PSD that the existing suburbs of Norwich and the immediate urban/rural fringe "are key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the links between the city centre and the surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated approach in this strategy. The area contains a considerable and diverse employment base." Paragraph 5.10 of the PSD refers to the need to enhance the character, appearance, recreational potential and biodiversity value of the urban edge. Within this context, particular gateways are significant, being places where "landscape and townscape changes, such as where the countryside and urban area meet, or main entrances into the city centre and town centres." We agree with Policy 2, which seeks to ensure that development proposals will respect local distinctiveness, including the treatment of gateways. When the various spatial elements are combined, a sustainable policy outcome, supporting the objectives of the JCS, would be the identification of a gateway development off Newmarket Road, to the east of the Thickthorn Interchange. The A11 is the most significant strategic gateway into Norwich and should be the location of a viable and high quality housing development/business park, forming a logical extension of the development forms broadly located between Colney Lane and Newmarket Road. The junction between the A11 and the A47 constitutes a clear strategic hub and the land either side of Newmarket Road should form part of the spatial strategic framework for the Norwich area, enabling the gateway concept described in Policy 2 of the PSD to be effected. Paragraph 13.65 of the East of England Plan acknowledges that road and rail links with Norwich are improving "particularly on the A11 corridor." Paragraph 13.67 of the EEP notes that the Norwich area's economic strengths include a diverse economic base and it is stated that "there are opportunities to build on existing strengths", with Norwich being able to benefit from its status as a major economic driver for a significant area of the Region. The EEP, at paragraph 13.69, refers to green infrastructure as a key delivery issue. The package of proposals advanced by our clients in connection with their vision of a Norwich Gateway will clearly deliver/implement policy positions/expectations established in the East of England Plan. Paragraph 5.1 of Appendix 3 of the Topic Paper entitled "strategy to accommodate major housing growth in the Norwich policy area" notes that the A47 "Norwich Southern Bypass has a major impact on the landscape" to the west of Cringleford and "serves some smaller areas of farmland adjoining the village from the surrounding countryside." We agree with the proportion that the A47 has a major impact on the landscape at the western approach to Norwich and the creation of a gateway development on either side of Newmarket Road at Cringleford will provide the opportunity to secure important visual enhancements as required in Policy 2. A master planning exercise will be required to ensure that the treatment of the Norwich Gateway is undertaken in a manner which responds to the strategic significance of the A11 corridor. That exercise will ensure that important strategic gaps are recognised and protected.

Joint Core Strategy Proposed submission Document

O - 11416 - 905 - Policy 2: Promoting good design - iii

11416 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 2 Promoting good design It is essential that a strong link is made between quality in the built environment and the historic environment, and that all new development is sensitive to its context. The Governments Strategy for high quality places 'World Class Places' identifies historic buildings and townscapes as key constituents within place-making

Joint Core Strategy Proposed submission Document

O - 11486 - 8057 - Policy 2: Promoting good design - ii

11486 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

re policy 2 promoting good designThe highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

S - 11511 - 8592 - Policy 2: Promoting good design - None

11511 Support

CHAPTER 5 Policy 2: Promoting good design

Respondent: Mr Charles Birch (Trustees of the Trafford Trust Estate) [8592] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: Policy 2 Promoting good Design Para 6.56 Para 6.56 states that Wroxham forms "a gateway to the Broads". We agree with that description and concur whereby all development is expected to be designed to the highest possible standards, creating a strong sense of place. It is necessary to seek to ensure that development proposals will respect local distinctiveness, including the landscape setting of settlements and the treatment of gateways. We acknowledge the importance placed upon the treatment of gateways at policy 2 para 5.10. with wroxhams particular relationship to the Broads, we recognise that new housing proposals at Wroxham should take into account not only the landscape setting/gateway issue but also the need to ensure an appropriate relationship to the Broads. Development at any scale and location should make a positive contribution to the provision of enhanced places to live and work. The quality of the local environment plays a crucial role in the economic success of the area and any development at Wroxham will incorporate these considerations/values. We agree that Wroxham forms "a gateway" to the Broads, and the location of the new housing should be chosen so as to present the opportunity to achieve a high quality gateway into Wroxham from Norwich. The Southern approach to Wroxham is not of a high landscape value, and new development in this general area can be utilised in a positive manner to achieve a significant enhancement in the visual experience of the approach to Wroxham from Norwich.

Joint Core Strategy Proposed submission Document

S - 11516 - 8591 - Policy 2: Promoting good design - None

11516 Support

CHAPTER 5 Policy 2: Promoting good design

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We agree with the observation at paragraph 5.9 of the PSD that development at any scale and location should make a positive contribution to providing better places for people. We recognise that a masterplan will be required to guide the proposed expansion of Long Stratton and that exercise will be based upon the objectives enshrined in Policy 2. A masterplan for Long Stratton will demonstrate not only how the new housing and bypass will be provided but also establishing an approach that ensures that the new housing/community facilities/retail/bypass will be related to the existing community.

Joint Core Strategy Proposed submission Document

O - 11517 - 7653 - Policy 2: Promoting good design - iii

11517 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary: Policy 2 Promoting Good Design Norfolk constabulary support the reference to designing out crime within the policy, although considers it could be positively strengthened by making reference to the fact that all development should meet 'secure by design'

Joint Core Strategy Proposed submission Document

O - 11532 - 8597 - Policy 2: Promoting good design - i, ii, iii

11532 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living contends that Policy 2 fails the JUSTIFIED, EFFECTIVE and NATIONAL POLICY soundness tests because elements of it are not founded on robust and credible evidence, it cuts across other legislation such as building regulations and it is inflexible as it seeks to impose a current standard for the entire plan period. Blue Living considers Policy 2's requirement for residential development to achieve buildings for life criteria silver standard (bullet point 12) to be unsound because: The requirement is not consistent with National Policy, it adds a further requirement beyond building regulation. It is not underpinned by evidence that it is viable and therefore deliverable. It seeks to impose a standard now, for the entire plan period. There is no evidence to suggest that this standard will be appropriate for the period up to 2026 or indeed whether the standard will still be relevant. Blue Living considers that the policy fails to take into account the likely possibility that technology will advance over the plan period and that imposed standards at this moment in time serve little purpose other than a potential 'block' to innovation. Blue Living considers the promotion of good design as an intrinsic part of the site's promotion. Carbon reduction and increased levels of green infrastructure e.g. community gardens and viable alternatives to the private car should be an expectation of all developments if a strong sense of place is to be created. Scant reference to expected norms such as Building For Life or Manual for Streets is insufficient for major development in locations such as North east Norwich is to be credible as a quality destination. Local evidence gathering and assessments will need to take account of the complex character of the city and its relationship with the adjacent countryside and Policy 2's requirement of promoting Good Design should take account of the value of local perspective as well as the necessary adherence to nationally inspired initiatives.

Joint Core Strategy Proposed submission Document

O - 11573 - 8018 - Policy 2: Promoting good design - ii

11573 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: 3b There is little reference to the density of dwellings in new developments (although 5.2 states the arguable objective that densities should 'take account of local characteristics'). This links to the fundamental challenge with development on the periphery of urban areas in that, up till now, they have tended to concentrate on detached and semi-detached properties with low densities of dwellings per hectare. While there is undoubtedly some demand for this type of property, we would like to see far more diversity in the type of housing produced, with planning policy encouraging developers to consider higher density forms of housing, such as terraces and flats, which have hitherto been associated with more central urban settings. This would thus free up valuable land for agriculture, urban green space, allotments, wildlife corridors and renewable energy generation. It would also in practice provide a higher degree of affordable housing and open up the private market to more young first time buyers. It is also the case that demographic changes are likely to result in an increased demand for smaller one and two bedroomed properties.

Joint Core Strategy Proposed submission Document

O - 11598 - 8203 - Policy 2: Promoting good design - i, ii, iii

11598 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: Country & Metropolitan Homes - formerly
Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes contends that Policy 2 fails the Justified, Effective and National Policy soundness tests because elements of it are not founded on robust and credible evidence, it cuts across other legislation such as building regulations and it is inflexible as it seeks to impose a current standard for the entire plan period. C&M Homes notes from Policy 2 (bullet point 11) that major development areas providing more than 500 dwellings or 50,000m² non-residential floorspace will be masterplanned, which in principle we have no objection to, however there is reference made in addition to these parameters which indicates 'areas of particular complexity', there is no criteria or evidence on which to determine how the authority will consider the complexity of individual schemes. Further clarification is required for this policy approach to outline the criteria which the Local Authority will use to determine the complexity of a scheme to warrant a masterplanned approach beyond the size parameters already identified. C&M Homes considers Policy 2's requirement for residential development to achieve buildings for life criteria silver standard (bullet point 12) to be unsound because:

1. The requirement is not consistent with national policy; it adds a further requirement beyond building regulation.
2. It is not underpinned by any evidence which demonstrates associated development costs of achieving this requirement, which questions the potential future viability and deliverability of development projects.
3. It seeks to impose a standard now, for the entire plan period of the plan. There is no evidence to suggest that this standard will be appropriate at this 'score' for the period up to 2026.

Joint Core Strategy Proposed submission Document

S - 11701 - 8363 - Policy 2: Promoting good design - ii

11701 Support

CHAPTER 5 Policy 2: Promoting good design

Respondent: Taylor Wimpey Developments & Hopkins Homes
[8363] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: We acknowledge the observation at Policy 2 that all development is expected to be designed to the highest possible standards, creating a strong sense of place. An extension of the existing Lodge Farm development area can readily be undertaken in a manner which will respect local distinctiveness, maintaining the perception of a gap between Easton and Costessey/Norwich. An urban extension in this location will respect the urban/rural transition and secure an appropriate treatment of this important western gateway into Norwich. We agree with paragraph 5.10 of the PSD which notes that the urban edge is particularly sensitive and planned extensions to Norwich should take account if the need to enhance its character and appearance. The Dereham Road approach to Norwich represents a gateway where the surrounding landscape meets the built-up area of Norwich. Given this context our clients acknowledge the need for the production of a masterplan for the proposed enlargement of the existing Lodge Farm development demonstrating how the whole scheme will function and ensuring that it is well related to adjacent development and infrastructure.

Joint Core Strategy Proposed submission Document

O - 11714 - 8618 - Policy 2: Promoting good design - i, ii

11714 Object

CHAPTER 5 Policy 2: Promoting good design

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

Policy 2: Promoting good design
In view of the choice of strategic locations for growth we question the need for the first three bullet points attached to this policy:
* There is no need for a requirement for development to maintain important strategic gaps if significant areas for growth have already been selected as it must be presumed that these have been chosen on the basis that they do not impact upon such gaps. Similarly, if development within other village/settlements are to be within defined settlement boundaries this again obviates the need for such a policy;
* Similar comments to the foregoing apply to the landscape setting of settlements, including the urban/rural transition (however this is defined); and the treatment of "gateways";
* The same comments apply to landscape character areas.
If these are deemed necessary, then the areas concerned should be identified on appropriate plans.
We object to the requirement to use sustainable and traditional materials because it is not necessarily the case that traditional materials are sustainable including being energy efficient. Developments and advancements in building and materials technology should be encouraged in order to reflect energy/water efficiency and sustainable development.

Joint Core Strategy Proposed submission Document

O - 11161 - 8464 - Policy 3: Energy and water - iii

11161 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: McCarthy & Stone Retirement Lifestyles Ltd. [8464] **Agent:** The Planning Bureau Ltd. (Mr. Matthew Shellum) [8463]

Full Text: The policy sets out a different timeframe for Code Level compliance than national government guidance for the introduction of different levels of the Code for Sustainable Homes. One of the tests of soundness is consistency with national planning policy. There is no justification to depart from the national timetable set out for achieving Code Level 4.

Summary: The policy sets out a different timeframe for Code Level compliance than national government guidance for the introduction of different levels of the Code for Sustainable Homes. One of the tests of soundness is consistency with national planning policy. There is no justification to depart from the national timetable set out for achieving Code Level 4.

Joint Core Strategy Proposed submission Document

O - 11168 - 8481 - Policy 3: Energy and water - i, ii

11168 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Broads Authority (Ms Andrea Long) [8481]

Agent: N/A

Full Text:

The draft AA for the JCS highlights issues around water e.g. quality, quantity and disposal. Environmental and capacity improvements are required to several sewage treatment works to provide capacity and new licences will be required to permit more extraction from the River Wensum at Costessey. In the absence of these licences, the existing planned development in the JCS would not be able to proceed. In relation to abstraction the Broads Authority would have concerns about future abstraction from already stressed resources. The final Water Cycle Study for the JCS is still to be finalised however, it does reveal some concerns. Strategic Interceptor Sewers to the north and south of Norwich are required to serve the proposed strategy. Failure to provide this will prevent development from taking place. There is limited sewer capacity which means that development would not be able to proceed until the new trunk sewer to the south is provided in 2020. Other than that served by local works the bulk of the development of Norwich will be served at Whittingham. This will require qualitative improvements phased in from 2015 onwards. This will also require revised consents from the Environment Agency and development will only be able to proceed once these are in place. The water cycle work to date raises questions over water quality and the ability to comply with European Water Framework Directive targets and importantly those relating to phosphorus discharge levels into receiving water bodies such as the Broads. This issue does need firm resolution before the JCS is submitted although the Water Cycle Study to date would appear to indicate that some of the solutions may be beyond current best available technology. The Broads Authority would be happy to work in partnership with others to look for solutions to these issues and suggests that rolling out the current work being undertaken on water for the Eco town at Rackheath across the wider JCS area may go some way to addressing the issue. The Broads Authority has over the last two decades invested considerable effort into improving the water quality of the Broads and would not wish to see this lost.

Summary:

BA is concerned that there is not enough water to serve the proposed level of development. That there is no guarantee that the quality of the water will be of a high enough quality once it has been used and that levels of discharge back into the Broads will have detrimental impacts on sensitive wetland sites which are subject to European protection. There is also not enough certainty that the required funding to deliver the required infrastructure is deliverable.

Joint Core Strategy Proposed submission Document

O - 11223 - 8542 - Policy 3: Energy and water - i, ii, iii

11223 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: The requirement for non-residential development over 50,000 sq.m. to meet all their energy needs from dedicated contractually linked renewable sources is unreasonable, unjustified not effective and not consistent with national policy. No work appears to be have been undertaken, as required by PPS1 and the East of England Plan to demonstrate that the costs of such requirements will not make development unviable. The requirement for sustainable energy statements is contrary to national policy - the requirements for planning applications should be set out in the local validation list not the development plan. The policy effectively seeks all major developments to be zero-carbon now. Government has not yet published a timetable or standards for its Code for Sustainable Buildings. There is no evidence to justify the requirement for achieving BREEAM standards and no assessment of the impact of such an approach on the viability of development as required by national policy.

Summary: The requirement for non-residential development over 50,000 sq.m. to meet all their energy needs from dedicated contractually linked renewable sources is unreasonable, unjustified not effective and not consistent with national policy.

Joint Core Strategy Proposed submission Document

O - 11240 - 8540 - Policy 3: Energy and water - i, ii, iii

11240 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The requirement for non-residential development over 50,000 sq.m. to meet all their energy needs from dedicated contractually linked renewable sources is unreasonable, unjustified not effective and not consistent with national policy. No work appears to have been undertaken, as required by PPS1 and the East of England Plan to demonstrate that the costs of such requirements will not make development unviable. The data within the energy study refers to costs in relation to residential development. It does not appear to have considered costs in relation to other forms of development. The study does not assess the impact of such costs on viability of development as is required by PPS1 and the East of England Plan. Rather the study states that the onus should be on the developer to demonstrate that the costs of such requirements will not make development unviable. That is not consistent with PPS1 which requires DPDs to demonstrate that the policy will not impact on deliverability. The requirement for sustainable energy statements is contrary to national policy - the requirements for planning applications should be set out in the local validation list not the development plan. The policy effectively seeks all development to be zero-carbon now. Government has not yet published a timetable or standards for its Code for Sustainable Buildings. There is no evidence to justify the requirement for achieving BREEAM standards and no assessment of the impact of such an approach on the viability of development

Summary:

The requirement for non-residential development over 50,000 sq.m. to meet all their energy needs from dedicated contractually linked renewable sources is unreasonable, unjustified not effective and not consistent with national policy. No work appears to have been undertaken, as required by PPS1 and the East of England Plan to demonstrate that the costs of such requirements will not make development unviable.

Joint Core Strategy Proposed submission Document

O - 11243 - 8547 - Policy 3: Energy and water - i, ii, iii

11243 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The requirement for residential development over 500 homes to meet all their energy needs from dedicated contractually linked renewable sources is unreasonable, unjustified, not effective and not consistent with national policy. The Government has set out a timetable for achieving Code Levels 4 and 6 in all new housing. There is no evidence presented to justify why bringing those dates forward are appropriate or achievable in the area. Nor has any work been undertaken on the costs of achieving such measures and the impact on development viability. The Code will be introduced via a national timetable and there is no need and no case for bringing forward the dates by which the Code should be achieved. The most recent work by Communities and Local Government, Cost Analysis of The Code for Sustainable Homes, suggests very significant costs in achieving the energy requirements of the Code. For example, Level 6 could add as much as £40,228 to the cost of a detached house. This data is repeated in the supporting energy study. However, that study does not assess the impact of such costs on viability of development as is required by PPS1 and the East of England Plan. Rather the study states that the onus should be on the developer to demonstrate that the costs of such requirements will not make development unviable. That is not consistent with PPS1 which requires DPDs to demonstrate that the policy will not impact on deliverability. There are also a number of technical issues to be resolved before these higher Code levels can be achieved. The policy requires 100% of a developments energy needs to come from renewable sources. At present the EEP requires 10%. It effectively requires that a landowner/developer is beholden to a third party to deliver renewable energy. If sites do not come forward for renewable energy provision development of much needed new homes will be delayed. The policy is likely to reduce the viability of development and delay the delivery of much needed new market and affordable homes.

The requirement for sustainable energy statements is contrary to national policy - the requirements for documentation to support planning applications should be set out in the local validation list not the development plan. The policy should be deleted. It is an unnecessary duplication of other regimes. The mechanism for controlling the energy performance of buildings is the Building Regulations.

Summary:

The policy should be deleted. It is an unnecessary duplication of other regimes. The mechanism for controlling the energy performance of buildings is the Building Regulations. The Code will be introduced via a national timetable and there is no need and no case for bringing forward the dates by which the Code should be achieved. No assessment of viability has been undertaken

Joint Core Strategy Proposed submission Document

O - 11244 - 8547 - Policy 3: Energy and water - i, ii, iii

11244 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The requirement for all residential development to meet the water standards ahead of the national timetable is unreasonable, unjustified, not effective and not consistent with national policy. No work appears to have been undertaken, as required by PPS1 and the East of England Plan, to demonstrate that the costs of such requirements will not make development unviable. The Government has set out a timetable for achieving the Code Levels 4 and 6 in all new housing. There is no evidence presented to justify why bringing those dates forward are appropriate or achievable in the area. Nor has any work been undertaken on the costs of achieving such measures. The most recent work by Communities and Local Government, Cost Analysis of The Code for Sustainable Homes, suggests significant costs in achieving the water requirements of the Code. For example, Level 6 could add as much as £2,625 to the cost of a detached house. when combined with other requirements such as the energy standards and community infrastructure payments, the costs are likely to prove excessive. Implementing such an approach is likely to reduce the viability of development and delay the delivery of much needed new market and affordable homes.

The policy should be deleted. It is an unnecessary duplication of other regimes. The mechanism for controlling the energy performance of buildings is the Building Regulations. The Code will be introduced via a national timetable and there is no need and no case for bringing forward the dates by which the Code should be achieved.

Summary:

The policy should be deleted. It is an unnecessary duplication of other regimes. The mechanism for controlling the energy performance of buildings is the Building Regulations. The Code will be introduced via a national timetable and there is no need and no case for bringing forward the dates by which the Code should be achieved. No work appears to have been undertaken, as required by PPS1 and the East of England Plan, to demonstrate that the costs of such requirements will not make development unviable.

Joint Core Strategy Proposed submission Document

O - 11320 - 6826 - Policy 3: Energy and water - i, ii

11320 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

We question the conclusion (paragraph 5.15) of the Greater Norwich Energy Study that renewable energy resource within the area can amply meet the energy demands of the planned new development; and that the technical potential represents over 160% of the area's current energy consumption. No information is given about the estimated investment costs to achieve the claims and the timescale of delivery, although these are likely to be barriers to the claim. We also question what level of efficiency would there need to be to provide a consistency of supply to meet demand. If the claims are achievable, then it is not clear why Policy 3 restrict the ambitions for 100% renewable energy to major development (more than 500 dwellings or 50,000sqm for non-residential development). The policy states that 'Provision will be made for strategic enhancement of the electricity and gas supply networks to support housing and employment growth' The County Council response to the RSS Review (appendix 3) on cost and timescales does not lend encouragement to this view. Reason: WaterThe 2006 Catchment Abstraction Management Strategy for the Broadland Rivers showed major problems, with many of the sub-catchments designated as over-abstracted (eg in the north east sector), and the remainder as over-licensed. The catchment includes a large concentration of water dependent EU sites of nature conservation. Against this background we make the following points which the policy does not address. The phrase 'with no significant detriment to areas of environmental importance' lacks clarity and effectiveness. Does this mean just EU sites, or does it apply to the wider countryside (as it should do)? In either case, it obscures the fact that it is difficult to assess detriment and it might take a number of years for significant detriments to be recognised and measurable. The need for agricultural irrigation is important to the efficiency of production of crops, and moreso if predicted future climate change weather patterns occur. Further, some EU sites depend on the wider countryside for their status, for example the Broadland rivers which run into the Broads. There is also the issue of waste water management. The response of Norfolk County Council to the RSS Review (paragraph 2.2, appendix 3, water cycle) sets out the major infrastructure costs and long timescales required to respond to planned levels of growth. Thus, to avoid unacceptable and significant damage being inflicted on the ecology of the natural environment, this growth must be downscaled or timescales extended.

Joint Core Strategy Proposed submission Document

O - 11333 - 8570 - Policy 3: Energy and water - i, ii, iii

11333 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 3 fails the: 1. Justified soundness test because elements of it, particularly the requirement for 100% renewable energy and compliance with Code for Sustainable Homes and BREEAM in advance of National timetables are not sufficiently underpinned by robust and credible evidence demonstrating that it is a viable, achievable and ultimately deliverable. Also, that it has been introduced very late on in the process without effective engagement of all interested parties. This is the first time that the 100% renewable energy target has been suggested in the JCS. 2. Effective soundness test because it includes unsuitable targets and has insufficient flexibility to deal with changing circumstances. Also, there is no information explaining how it will be implemented and monitored. 3. National Policy soundness test because the Policy's renewable energy requirements (100% of energy from renewable sources) and Code for Sustainable Homes compliance go beyond National and regional policy with insufficient local justification. Reasons: Hethersett Land Ltd notes that Policy 3 requires (inter alia) that all major developments will be required to have all their energy needs supplied from dedicated, contractually linked renewable sources and to achieve certain code levels in advance of national compliance dates. Hethersett Land Ltd considers the requirement to be unsound because: 1. The requirement is not consistent with existing and/or emerging national and regional policy. National policy for energy usage and residential building performance is being driven by the consultation on Zero Carbon Homes and the impending 2010 revision to Part L of the Building Regulations. Also, the East of England Plan requires all developments over 10 dwellings or 1000 square metres to provide 10% of energy from renewable sources, not all of it. As drafted, Policy 3 does not make reference to these in the requirements for provision of renewable energy generation. It is likely that national policy, once it is confirmed, will present a different set of requirements than those presented here. This is likely to include a hierarchical approach for compliance with emissions reductions from developments: minimum standards for building fabric energy efficiency; A significant proportion, i.e. 70%, importantly not all of regulated energy demand to be provided by on-site renewable generation; the remaining 30% of regulated energy and 100% of unregulated energy demand to be delivered via 'allowable solutions' which is likely to include contractually linked renewable energy sources. The JCS policy does not reflect these requirements. Whilst it is accepted that it may be appropriate to require significantly higher standards at the proposed Eco-community at Rackheath, there is no evidence demonstrating that it is required or indeed deliverable at all of the major growth locations. 2. It is not underpinned by any evidence that it is viable and therefore deliverable. The reference in para 5.15 to the Greater Norwich Sustainable Energy study correctly identifies the technical potential for renewable energy in the area. However the Proposed Submission Document does not refer to the constraints relating to viability from an economic and planning perspective which are highlighted in the study report. 3. There is also no evidence to demonstrate how the policy will be enforced and/or monitored. 4. It is insufficiently flexible to deal with changing circumstances. It seeks to impose a set of requirements now, for the entire plan period of the plan. There is no evidence to suggest that these requirements can be met now or that they will remain relevant for the entire plan period. 5. It requires development to achieve the Code for Sustainable Homes level 4 on adoption of the plan and 6 by 2015. This is in advance of national policy which is expected to require compliance with Code 4 by 2013 (2010 for Housing Corporation funded housing) and for Code 6 by 2016 (2013 for Housing Corporation funded housing). There is no reference within the Proposed Submission Document to the potential economic or planning constraints to the delivery of these standards in advance of national policy. Conclusion: Policy 3 fails all three soundness tests. It is not based on robust and credible evidence that it is deliverable; it goes beyond National and Regional Policy's requirements with no local justification and evidence that it can be delivered; it is insufficiently flexible to deal with changing circumstance; and it is not explained how it will be implemented and monitored.

Joint Core Strategy Proposed submission Document

O - 11353 - 2373 - Policy 3: Energy and water - None

11353 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary:

It is unreasonable to require all new housing to match current Housing Corporation requirements under the Code for Sustainable Homes. The house building industry is committed to working in stages towards the government's aspiration to achieve zero carbon new dwellings by 2016. However where achieving specific levels or ratings under the Code may not be feasible or viable for unsubsidised open market housing, particularly whilst achieving other objectives, such as providing affordable housing or meeting infrastructure requirements. A more flexible policy wording is needed that promotes more sustainable construction and carbon reduction measures rather than requiring certain levels or ratings. This would also be more adaptable to changing technologies and any future changes in government policy.

Joint Core Strategy Proposed submission Document

O - 11374 - 8574 - Policy 3: Energy and water - i, ii, iii

11374 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Mr Paul Rogers [8574]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood) [7175]

Full Text:

Summary:

Paul Rogers contends that policy 3 fails the;1. Justified soundness test because elements of it, particularly the requirement for 100% renewable energy and compliance with Code for sustainable Homes and BREEAM in advance of national timetables are not sufficiently underpinned by robust and credible evidence demonstrating that it is viable, achievable and ultimately deliverable. Also, that it has been introduced very late in the process without effective engagement of all interested parties. This is the first time that the 100% renewable energy target has been suggested in the JCS.2. Effective soundness test because it includes unsuitable targets and has insufficient flexibility to deal with changing circumstances. Also, there is no information explaining how it will be implemented and monitored.3. National policy soundness test because the policy's renewable energy requirements (100% of energy from renewable sources) and Code for sustainable Homes compliance go beyond national and regional policy with insufficient local justification.1. The requirement is not consistent with existing national and /or emerging national and regional policy. National Policy for energy usage and residential building performance is being driven by the consultation on zero carbon homes and the impending 2010 revision to part L of the building regulations. Also East of Eng Plan requires developments over 10 dwellings or 1000 sq mts to provide 10% of energy from renewable sources, not all of it. Policy 3 as drafted makes no ref to these. National policy once confirmed is likely to require different requirements. This is likely to include a hierarchical approach for compliance with emissions reductions from developments: minimum standards for building fabric energy efficiency; a significance portion i.e. 70% importantly not all of regulated energy demand to be provided by on-site renewable generations; the remaining 30% of regulated energy and 100% of unregulated energy demand to be delivered via 'allowable solutions' which is likely to include contractually linked renewable energy sources. The JCS does not reflect these requirements. Whilst it is accepted that it may be appropriate to require significantly higher standards at the proposed Eco-community at Rackheath, there is no evidence demonstrating that it is required or indeed deliverable at all of the major growth locations.2. It is not underpinned by any evidence that it is viable and therefore deliverable. The ref in para 5.15 to the Greater Norwich Sustainable energy study correctly identifies the technical potential for renewable energy in the area. However the proposed submission document does not refer to the constraints relating to viability from an economic and planning perspective which are highlighted in the study report. There is also no evidence to demonstrate how the policy will be enforced and/or monitored. It is insufficiently flexible to deal with changing circumstances. It seeks to impose a set of requirements now, for the entire plan period of the plan. There is no evidence to suggest that these requirements can be met now or that they will remain relevant for the entire plan period. It requires development to achieve the Code for Sustainable Homes level 4 on adoption of the plan and 6 by 2015. This is in advance of national policy which is expected to require compliance with code 4 by 2013 (2010 for housing corporation funded housing) and for code 6 by 2016 (2013 for Housing Corp. funded housing). There is no reference within the Proposed Submission Doc to the potential economic or planning constraints to the delivery of these standards in advance of national policy. Policy 3 fails all three tests of soundness.

Joint Core Strategy Proposed submission Document

O - 11432 - 8577 - Policy 3: Energy and water - i, iii

11432 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Serruys Property Company Ltd [8577]

Agent: Lanpro (Mr Philip Atkinson) [7507]

Full Text:

Summary:

My client considers that the requirement for major development proposals (defined as that exceeding 500 dwellings or 50,000 sq.m for non-residential floor space) to secure 100% of their energy requirements from linked renewable sources as overly onerous, likely unlawful and not in compliance with Government guidance. To support this view my client would direct the GNDP to Appendix C of the Renewable Energy Capacity in Regional Spatial Strategies Final Report that was published by the DCLG in July 2009. Policy ENG1 of this document entitled Carbon Dioxide Emissions and Energy Performance is specific to the East of England and states 'To meet regional and national targets for reducing climate change emissions, new development should be located and designed to optimise its carbon performance. Local authorities should: - Encourage the supply of energy from decentralised, renewable and low carbon sources and through Development Plan Documents set ambitious but viable proportions of energy supply of new development to be secured from such sources and the development thresholds to which such targets should apply. In the interim, before targets are set in Development Plan Documents, new development of more than 10 dwellings or 1,000 sq.m of non-residential floor space should secure at least 10% of their energy from decentralised and renewable or low carbon sources, unless this is not feasible or viable ...'My client is committed to maximising the use of renewable or low carbon energy sources where feasible, affordable and importantly viable within the redeveloped Deal Ground and May Gurney sites. My client is however seriously concerned that the planning requirement to contractually link energy producing and consuming sites in separate ownerships to the financial benefit of one owner and the detriment of another through the planning process is unlawful. The approach proposed under the emerging Policy fails to accord with Government guidance as it is inflexible, denies freedom of choice for both end users and the developer and places an unfair financial burden on developer and end user that cannot be justified. As such having regard to all the above the emerging Policy fails the key tests of soundness outlined in Government guidance.

Joint Core Strategy Proposed submission Document

O - 11437 - 8254 - Policy 3: Energy and water - i, ii, iii

11437 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Kier Land Ltd [8254]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood)
[7175]

Full Text:

Summary:

Kier Property contends that Policy 3 fails the:1. Justified soundness test because elements of it, particularly the requirement for 100% renewable energy and compliance with Code of Sustainable Homes and BREEAM in advance of national timetables are not sufficiently underpinned by robust and credible evidence demonstrating that it is viable, achievable and ultimately deliverable. Also, that it has been introduced very late on in the process without effective engagement of all interested parties. This is the first time that the 100% renewable energy target has been suggested in the JCS.2. Effective soundness test because it includes unsuitable targets and has sufficient flexibility to deal with changing circumstances. Also, there is no information explaining how it will be implemented and monitored.3. National Policy soundness test because the Policy's renewable energy requirements (100% of energy from renewable sources) and Code for Sustainable Homes compliance go beyond national and regional policy with insufficient local justification. SEE PAPER REP for Reasons

Joint Core Strategy Proposed submission Document

S - 11470 - 934 - Policy 3: Energy and water - None

11470 Support

CHAPTER 5 Policy 3: Energy and water

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

Policy WAT2 - Water Infrastructure
The Environment Agency and water companies should work with OFWAT, EERA and the neighbouring regional assemblies, local authorities, delivery agencies and others to ensure timely provision of the appropriate additional infrastructure for water supply and waste water treatment to cater for the levels of development provided through this plan, whilst meeting surface and groundwater quality standards, and avoiding adverse impact on sites of European or international importance for wildlife. (page 67)
The key element here is the timely provision of the requisite infrastructure, without which growth would have adverse impacts on wildlife sites, and which would prevent the plan from becoming legally compliant. Therefore, we strongly support the wording of your Policy 3, which accords with this regional approach: 'The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development and to ensure that water quality is protected or improved, with no significant detriment to areas of environmental importance. ... This water infrastructure will be upgraded as required and be operational in time to meet the demands of any development.' (page 39)

Joint Core Strategy Proposed submission Document

O - 11522 - 8300 - Policy 3: Energy and water - ii

11522 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Phillip Jeans Homes Ltd [8300]

Agent: Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text:

Summary:

We are of the view that Policy 3 - energy and water , sufficiently addresses climate change and promotes sustainability in all development. The policy is in line with central government guidance. The requirement for all new housing development to reach Code for sustainable Homes level 4 for energy on adoption of this plan is considered reasonable however in respect of meeting code 6 by 2015 will cut any profit margins. Evidence from Knight Frank (2008) suggests that a house built to level 6 at 2007 construction prices will cost in the region of £30,000 to £35,000 extra to construct. Whilst we do not suggest these levels are pushed down, it is clear that once a developer takes into consideration other contributions and possibly a Community Infrastructure Levy (CIL), the development could be unviable to build. This in turn causes a decrease in house building and house housing targets will not be met

Joint Core Strategy Proposed submission Document

O - 11537 - 8597 - Policy 3: Energy and water - i, ii, iii

11537 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living contends that policy 3 fails the JUSIFIED soundness test because elements of it e.g. the requirement for 100% renewable energy and compliance with Code for Sustainability Homes and BREEAM in advance of National timetables are not sufficiently underpinned by robust and credible evidence demonstrating that it is viable, achievable and ultimately deliverable. Also that it has been introduced very late on in the process without effective engagement with all interested parties. This is the first time that the 100% renewable energy target has been suggested in the JCS. EFFECTIVE soundness test because it includes unsuitable targets and has insufficient flexibility to deal with changing circumstances. Also, there is no information explaining how it will be implemented and monitored. NATIONAL POLICY soundness test because the Policy's renewable energy requirements (100% of energy from renewable sources) and Code for Sus. Homes compliance go beyond national and regional policy without sufficient local justification. Summary of Reasons; National Policy for energy usage is being driven by the consultation on Zero Carbon and the impending 2010 revision to part L of the Building Regulations. East of Eng. Plan requires developments over 10 dwellings or 1000 sq mtrs to provide 10% of energy from renewables. The National policy when confirmed is likely to include a hierarchical approach for compliance with emissions reductions from developments; minimum standards for building fabric energy efficiency; a significant proportion i.e. 70% to be provided by on-site renewable generation the remaining 30% of regulated energy and 100% of unregulated energy demand to be delivered via 'allowable solutions', likely to include contractually linked renewable energy sources. The JCS policy does not reflect these requirements. Whilst it is accepted that the higher requirement is appropriate at Ec0community there is no evidence that it is required or deliverable at all the major growth locations. It is not underpinned by evidence that it is viable or deliverable. The ref in para 5.15 to the Greater Norwich Sus. Energy study correctly identifies the technical potential for renewable energy in the area. The proposed submission document does not refer to the constraints relating to viability from an economic and planning perspective which are highlighted in the study report. There is also no evidence to demonstrate how the policy will be enforced and/or monitored. It is insufficiently flexible to deal with changing circumstances. It seeks to impose a set of requirements now, for the entire period of the plan. It requires development to achieve the Code for Sus. Homes level 4 on adoption and 6 by 2015. This is in advance of national policy which is expected to require compliance with Code 4 by 2013 (2010 for HCA funded housing) and Code 6 by 2016 (2013 for Housing Corporation funded housing). There is no reference within the Proposed Submission Document to the potential economic or planning constraints to the delivery of these standards in advance of national policy.

Joint Core Strategy Proposed submission Document

S - 11551 - 7060 - Policy 3: Energy and water - None

11551 Support

CHAPTER 5 Policy 3: Energy and water

Respondent: Broadland Community Partnership (Mrs Kathryn de Vries) [7060] **Agent:** N/A

Full Text:

Summary: We would support the GNDP's view that the pre-submission document is legal and sound but have concerns about infrastructure restraints. water and Waste water disposal is a key issue for Norfolk a dry county. We are concerned to ensure sufficient infrastructure is in place to protect the local environment. We wish to see a process or strategy by which the GNDP will ensure that development with insufficient infrastructure is blocked. Whilst we understand that water related issues have not yet been resolved, we believe that continuing negotiations with partners to resolve these issues is taking place. Resolution will allow the planned development to take place.

Joint Core Strategy Proposed submission Document

S - 11565 - 7463 - Policy 3: Energy and water - ii

11565 Support

CHAPTER 5 Policy 3: Energy and water

Respondent: GO East (Ms Mary Marston) [7463]

Agent: N/A

Full Text:

Summary: Policy 3 - Energy and Water 1. We welcome the broad ambitions for driving up the performance of new development in relation to energy and water, set out at Policy 2. We note that the innovative approach to securing carbon neutral development by 2015 reflects evidence of local feasibility derived from the Greater Norwich Sustainable Energy Study. 2. In relation to water, the policy has been formulated with reference to the preliminary findings of the Water Cycle Study, which indicated that there is likely to be sufficient water supply and waste water treatment capacity to meet the planned level of growth. I am aware that further detailed analysis of waste water treatment and sewerage capacity has been undertaken subsequent to publication of the submission draft, and the final submission document will need to take account of this. 3. If the conclusions of the Water Cycle Study indicate that there is less certainty in relation to future capacity, revisions to Policy 2 may be necessary to reflect the Partnership's response. In addition, if the evidence points to constraints at specific locations, you will also need to consider whether your 'policies for places' would require revision. In particular, you may need to identify critical infrastructure requirements on which delivery of the proposed growth is dependent.

Joint Core Strategy Proposed submission Document

O - 11572 - 8018 - Policy 3: Energy and water - ii

11572 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: 3a One major cause for concern is that there is no reference in the Strategy of improving efficiency in the use of energy or water in existing properties to accompany growth. Without such improvements it is likely that water supply will come under particular strain and the overall carbon output of the area will almost certainly increase. We would like to see a target of, at a minimum, no overall increase in either water usage or carbon output for the Norwich Policy Area which would mean introducing such measures as grey water recycling, free insulation and renewable energy provision for existing properties.3c In 3.7 page 16 of the strategy it refers to the decline in relative importance of manufacturing and agriculture. Given that local production is a key aspect to sustainability, we would argue that the strategy should address this decline rather than accept it.3d Why, in 5.13, does it specify that renewable energy has to be supplied from on-shore sources?3e 5.16 envisages use of biomass fuel, yet there are considerable question marks over the true sustainability of using land to produce fuel rather than an localised food supply.

Joint Core Strategy Proposed submission Document

O - 11582 - 7738 - Policy 3: Energy and water - ii

11582 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Anglian Water (Mrs Sue Bull) [7738]

Agent: N/A

Full Text:

Summary:

The draft Water Cycle study stage 2b report has identified significant constraints to the proposed development allocations on grounds of environmental capacity (predominantly water quality and in some cases volumetric). The proposed development can be accommodated at our WWTWs subject to the Environment Agency granting increase volumetric consent. This of course is subject to phasing and funding where long term sustainability needs to be taken into account. The main constraint would be in achieving the tight sanitary consents which would come with the increased volumetric consents, some of which have already been indicated as beyond best available technology. These tightened sanitary consents could possibly be achieved but at excessive costs. Policy 1 and 3: A policy of surface water separation needs to be adopted on all new developments and it needs to be reinforced that any new highway drainage does not enter into Anglian Water's network system.

Joint Core Strategy Proposed submission Document

O - 11599 - 8203 - Policy 3: Energy and water - i, ii, iii

11599 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Country & Metropolitan Homes - formerly Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes suggests that Policy 3 fails the 'Justified' 'Effective' and 'National Policy' soundness tests for the following reasons: Justified - elements of the policy, particularly the requirement for 100% renewable energy and compliance with Code for Sustainable Homes and BREEAM in advance of national timetables are not sufficiently underpinned by robust and credible evidence demonstrating that it is a viable, achievable and ultimately deliverable approach. Also, the policy approach has been introduced very late in the process without effective engagement of all interested parties. This is the first time that the 100% renewable energy target has been suggested in the JCS. Effective - the policy approach includes unsuitable targets and has insufficient flexibility to deal with changing circumstances. Also, there is no information explaining how the policy will be implemented and monitored. The policy seeks to impose a set of requirements now, for the entire plan period of the plan. There is no evidence to suggest that these requirements can be met now or that they will remain relevant for the entire plan period. Consistent with National Policy - the policy's renewable energy requirements (100% of energy from renewable sources) and Code for Sustainable Homes compliance goes beyond National and Regional Planning Policy requirements without sufficient justification. National Policy for energy usage and residential building performance is being driven by the consultation on Zero Carbon Homes and the impending 2010 revision to Part L of the Building Regulations. Also, the East of England Plan requires all developments over 10 dwellings or 1000 square metres to provide 10% of energy from renewable sources. As drafted, Policy 3 does not make reference to these in the requirements for provision of renewable energy generation. It is likely that national policy, once it is confirmed, will present a different set of requirements than those presented here. This is likely to include a hierarchical approach for compliance with emission reductions from developments: minimum standards for building fabric energy efficiency; a significant proportion, i.e. 70% of regulated energy demand to be provided by on-site renewable generation; the remaining 30% of regulated energy and 100% of unregulated energy demand to be delivered via 'allowable solutions' which is likely to include contractually linked renewable energy sources. The JCS policy does not reflect these requirements. The policy requires development to achieve the Code for Sustainable Homes level 4 on adoption of the plan and 6 by 2015. This is in advance of national policy which is expected to require compliance with Code 4 by 2013 (2010 for Housing Corporation funded housing) and for Code 6 by 2016 (2013 for Housing Corporation funded housing). There is no reference or acknowledgment within the Proposed Submission Document to the potential economic or planning constraints to the delivery of these standards in advance of national policy.

Joint Core Strategy Proposed submission Document

O - 11605 - 8607 - Policy 3: Energy and water - i, ii, iii

11605 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607]

Agent: Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that the limitation of 300 dwellings only at Aylsham is founded on nothing but a cursory consideration of an arbitrary division of housing requirement figures and infrastructure capacity analysis, specifically sewage. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth in Aylsham is provided. Our client's land interest is the site at Sir Williams Lane, Aylsham which is capable of accommodating up to 500 dwellings and supporting infrastructure. By limiting the scale of growth at Aylsham to 300 dwellings the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.

Summary: We are of the view that Policy 3 - Energy and Water, sufficiently addresses climate change and promotes sustainability in all development. The policy is in line with central government guidance. The requirement for all new housing development to reach Code for Sustainable Homes level 4 for energy on adoption of this plan is considered reasonable however our comments in respect of the expectation to meet Code 6 by 2015 are elucidated below. It is anticipated that the site will be completed well in advance of 2015 and therefore would exhibit Code 4 rating. 5.2 Whilst there is no argument that sustainable neighbourhoods are a key element of the vision, there is some concern that the enforcement of such high standards, particularly those set out in the Code for Sustainable Homes (i.e. Code 6 from 2015), will cut any profit margins. Evidence from Knight Frank (2008) suggests that a house built to Code Level 6 at 2007 construction prices will cost in the region of £30,000 to £35,000 extra to construct. Whilst we do not suggest these levels are pushed down, it is clear that once a developer takes into consideration other contributions and possibly a Community Infrastructure Levy (CIL), the development could be unviable to build. This in turn causes a decrease in house building and housing targets will not be met. The GNPD must take this into consideration when appraising new developments, and in some cases where viability is an issue, other contributions may be reduced.

Joint Core Strategy Proposed submission Document

O - 11651 - 8366 - Policy 3: Energy and water - i, ii, iii

11651 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. It is noted that this is a new policy so the BLT have not previously commented on it. It should be further noted that despite being recognised as proactively promoting land for development within the Growth Triangle, the BLT have not been consulted on delivery arrangements for energy and water. The BLT are concerned with the first bullet of the policy, which requires major development to be supplied with all of their energy needs from dedicated, contractually linked renewable sources. It is noted that the GNDP have carried out a Sustainable Energy Study for the Joint Core Strategy, which suggests that although this is potentially the cheapest way of delivering a zero carbon development (if provided through wind turbines) the report also notes that there are very few housing developments in the UK that have established a contractual arrangements in this way (page 4, of the Sustainable Energy Strategy). As such, there are concerns over the deliverability of such a strategy. In addition, it is not clear how viability has been taken into account when considering other requirements, such as the Code for Sustainable Homes, affordable housing and section 106, which will also be placed on major development. As such, it is not considered that a robust strategic viability study has been undertaken in this regard in line with paragraphs 26 and 28 of the supplement to PPS1. In addition, the BLT also have concerns over the potential for the proposed local Energy Service Companies to hold developers to ransom in terms of the cost of energy provision, as it is unclear if there are any mechanisms to prevent this. As such, it is considered that, as currently worded, policy 3 threatens the delivery of the strategy in terms of potentially making development unviable. BLT would wish to enter into early discussions with the GNDP around the creation of ESCOs or MUSCOs as part of a public/private partnership approach to support the delivery of energy and water infrastructure in the Growth Triangle to ensure that the utility delivery business model that is adopted supports rather than potentially undermines the viability of the growth scenario. Previously the BLT made representations stating that the requirements to comply with the Code for Sustainable Homes needs to be considered in the context of the Government's timetable. Policy 3 advances the Government's timeframe by requiring all new housing development to reach Code for Sustainable Homes level 4 by the adoption of the plan and level 6 by 2015. As the GNDP have not provided any response to previous representations, it is not clear as to why they have taken this approach and, therefore, it is not considered to be justified.

Joint Core Strategy Proposed submission Document

O - 11669 - 8511 - Policy 3: Energy and water - i, ii, iii

11669 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary: Policy 3 specifies a number of initiatives which go beyond national targets for sustainable development, such as contributions to offsetting carbon emissions and very high levels of water and energy efficiency. We are concerned that these measures may reduce the financial viability of the proposed new developments, and may in turn lead to a lack of funding for essential infrastructure. The Core Strategy will need to demonstrate that Policy 3 is founded on a robust evidence base, which demonstrates that it will not adversely affect the deliverability of new development. Paragraph 7.4 of the Core Strategy notes that 'Studies show that the cost of required infrastructure is likely to exceed expected income from all sources.' Given this shortage of funding, the need for policies which exceed already demanding government targets should be weighed against the financial sustainability of the development proposed in the Core Strategy as a whole.

Joint Core Strategy Proposed submission Document

O - 11683 - 8352 - Policy 3: Energy and water - i, ii

11683 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary:

The background evidence to the Joint Core Strategy includes a Stage 2b Water Cycle Study (WCS) carried out by Scott Wilson, dated September 2009. However, to date this document is still in draft form. We understand that amendments will be made which unfortunately will not be in time for this consultation process. Nevertheless, it is acknowledged within paragraph 5.3.2. of the (draft (Sept 09)) WCS that "the East of England is one of the driest parts of the country and this combined with the high demand from its residents (both permanent and tourist populations) and from industry (including agriculture), means that the GNDP area lies within an area of 'serious water stress' ". Furthermore, paragraph 5.3.7 and figure 5-1 of the (draft (Sept 09)) WCS state that the additional growth proposed will lead to an increase in demand for water and that this increase may be between 10MI/d and 17MI/d by 2031 depending upon the level of water usage of new and existing properties. This could put further pressure on water resources in the region and therefore it is necessary to ensure that water resources are used as efficiently as possible. In deed, paragraph 5.7.15 of the (draft (Sept 09)) WCS acknowledges that 'it is an aim for any development (new housing or new employment), to use no more water than is absolutely necessary and re-use as much water as is practical'.

Furthermore, the Review of Consents (RoC) carried out by the Environment Agency is currently underway and will identify abstraction licences and consents which may be having an adverse impact upon ecological sites listed under the Habitats Directive (HD). With regard to water resources, the RoC is due to report around March 2010. For abstractions which are found to be having an adverse impact, measures will be put forward to mitigate this impact which may be in the form of a sustainability change/reduction. This may require the Water Company to reduce abstraction from some of its sources in the Greater Norwich area. The (draft (Sept 09)) WCS has been unable to consider this possibility which could put further pressure on water resources in the region. However, it is important to stress that, in terms of the RoC outputs, a sustainability change that does not require an actual reduction in abstraction may be found and that whatever the solution, the Water Company will be given time and the funding to find a replacement for any reduction in supplies. Our water impacts modelling work referred to below made this same assumption. It should also be noted that we are about to publish our updated water impacts report for the East of England as part of our response to the East of England Plan Partial Review. Similarly to the previous version of the report, the study has modelled the effect on water company supplies of various housing growth and water efficiency scenarios. The results of our modelling show that water supply is not a blocker for the Partial Review's proposed higher growth rates for the Norwich area if water companies enact the measures identified in their water resources management plans. Please refer to the report for the full results and modelling assumptions. Notwithstanding the above, it is important that the Joint Core Strategy fully recognises the need to ensure that water resources in the region are protected as far as possible to account for any future uncertainties that may arise. The potential requirements of any scheme that may be found necessary to provide additional water supplies in the future is likely to be reduced if the JCS seeks higher water efficiency measures for all development. The importance of water efficiency is recognised by national planning policy. PPS 1 paragraph 22 states that "development plan policies should seek to minimise the need to consume new resources over the lifetime of the development by making more efficient use or reuse of existing resources"... "Regional planning authorities and local authorities should promote resource and energy efficient buildings ...and the sustainable use of water resources". Furthermore, objective V of the East of England plan (pg 7) is to improve and conserve the region's development by reducing the demand for, and use of, water. The East of England Implementation Plan (EEIP) includes policies for all new homes to achieve Code for Sustainable Homes (CfSH) level 3 of 105 litres per head per day (l/h/d) and a target of reducing average per capita consumption (pcc) (for both measured and unmeasured customers) to 120 l/h/d by 2030. We acknowledge that policy 3 and the supporting paragraphs consider this issue, with new housing required to reach a (CfSH) level 4 (105 l/h/d) for water on adoption of the document and developments of over 500 dwellings reaching a code level 6 (80l/h/d) by 2015. We fully support this policy aim to increase the water efficiency of new housing which, given the link between water and energy efficiency and the potential to make joint savings in carbon, will also aid the aspiration of carbon efficiency within spatial planning objective 1. However, given the water stressed nature of the area and the need to use existing water supplies as efficiently as possible. (also referred to in JCS paragraph 5.22), we feel that there should also be an aspiration to achieving water neutrality across the JCS area, so that total water use following the additional development proposed does not exceed water use prior to that development. The (draft (Sept 09)) WCS has demonstrated how this may be achievable in some locations within the JCS area. Additionally, a study carried out by the Environment Agency (Towards water neutrality in the Thames Gateway), has demonstrated that such an aspiration is technically feasible across a wider area, and there are a number of methods through which it can be achieved.

Joint Core Strategy Proposed submission Document

O - 11702 - 8363 - Policy 3: Energy and water - i

11702 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary: Policy 3 requires all new housing development to reach Code for Sustainable Homes level 4 on adoption of the JCS and level 6 by 2015. The CLG document entitled "Greener Homes for the Future" notes that in 2006 "the Government announced a 10-year timetable towards a target that all new homes from 2016 must be built to zero carbon standards." The document requires Code Level 4 to be achieved in 2013 and Code Level 6 in 2016. The PSD provide no reason for the proposed divergence from the timetable anticipated by the Government. Local Planning Authorities, developers and other stakeholders in the provision of new developments are expected to engage constructively to achieve the national timetable for reducing carbon emissions from domestic buildings. Policy 3 of the PSD conflicts with national guidance in that whilst the JCS proposes local requirements for sustainable buildings, the PSD does not demonstrate clearly the local circumstances that warrant and allow this approach. The proposals outlined in Policy 3 do not emerge from the evidence base and are not viable, having regard to the overall costs of bringing sites to the market and the need to avoid any adverse impact on the development needs of communities.

Joint Core Strategy Proposed submission Document

O - 11715 - 8618 - Policy 3: Energy and water - i, ii

11715 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

Policy 3: Energy and water Any policy which demands development to be low or zero carbon needs to define what that entails. Paragraph 5.15 exhorts that the energy demands of the planned new development and zero carbon standards are achievable locally ahead of national requirements yet the DPD nowhere states what these are. The requirement that all major development (500 dwellings or 50,000m² of non residential development or more) has to be supplied with all their energy needs from dedicated, contractually linked renewable sources is completely unacceptable. Apart from the fact that this runs contrary to government policy, it also promotes a monopolistic situation with regard to prospective energy providers who believing they have a captive market can end up charging what they like for their energy supplies. In a competitive market situation this is totally unacceptable and runs counter to the free market position whereby consumers can choose who to have provide their energy needs/requirements. We consider that this policy is an attempt to guarantee that specific energy generation projects proposed within the Greater Norwich area are assured of a captive market. Apart from it being anti-competitive it will render many development projects unviable if they have to comply with its requirements. We also question why there is a requirement for any developments to have to contribute to a carbon offset fund when the policy requires all development in the area to be low or zero carbon. Zero carbon implies that developments will generate all their own energy requirements and need not therefore be dependent upon any external source. If this is to be the case we object to any requirement for smaller developments to have to contribute to a carbon-offset fund to achieve carbon savings at least equivalent to on-site zero carbon, when the development may already be achieving zero carbon, however that is to be defined. We further object to any proposal to establish a carbon offset fund. It is unclear what the basis for this is and whether or not it is proposed to cover the possibility of no CIL scheme being in place by the time developments commence. There is no provision for such a fund being established within the RSS and this amounts to a further stealth tax upon development. The idea that new development has to fund improvements to existing developments is unreasonable and will render many new developments unviable. In order for all new housing to be low or zero carbon they must be able to achieve at least Code for Sustainable Homes level 6 from the outset. Some properties may be able to achieve carbon positive whereby they generate more energy than required for their own needs. The policy should permit refunds in such cases? The policy states that other DPDs will allocate land for renewable energy development but gives no indications of where and when and if these are required in order to enable any of the strategic growth options to proceed. Similarly, the policy states that provision will be made for strategic enhancement of the electricity and gas supply networks to support housing and employment growth but it is unclear whether there is any current commitment to providing this infrastructure and when. Water The policy states that the release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from new development. Again, the policy is silent on when and where any commitment to provide this will occur.

Joint Core Strategy Proposed submission Document

O - 11726 - 8607 - Policy 3: Energy and water - i, ii, iii

11726 Object

CHAPTER 5 Policy 3: Energy and water

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607]

Agent: Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that up to 250 dwellings should be allocated at Mulbarton. Presently the settlement is earmarked for between 10 - 20 dwellings as it is classified as a Service Village under Policy 15 of the JCS. We consider this figure is founded on nothing but a simple averaging exercise rather than a considered approach to capacity. The submitted JCS does nothing to explain why the housing figures in Policy 15 have been divided in this way and no reasoned justification for the proposed level of growth within these Service Villages. We believe there should be two levels of Service Village, Minor and Major. The Minor Service Villages have extremely limited services and should not receive any growth, whilst the Major Service Villages such as Mulbarton should receive a much higher allocation. Furthermore the 1,800 dwellings to be allocated to smaller sites in South Norfolk should be taken into consideration, meaning Major Service Villages such as Mulbarton should receive in the region of 250 dwellings.

Summary: We are of the view that Policy 3 - Energy and Water, sufficiently addresses climate change and promotes sustainability in all development. The policy is in line with central government guidance. The requirement for all new housing development to reach Code for Sustainable Homes level 4 for energy on adoption of this plan is considered reasonable however our comments in respect of the expectation to meet Code 6 by 2015 are elucidated below. It is anticipated that the George Lane site will be completed in advance of 2015 and therefore would exhibit Code 4 rating. 5.2 Whilst there is no argument that sustainable neighbourhoods are a key element of the vision, there is some concern that the enforcement of such high standards, particularly those set out in the Code for Sustainable Homes (i.e. Code 6 from 2015), will cut any profit margins. Evidence from Knight Frank (2008) suggests that a house built to Code Level 6 at 2007 construction prices will cost in the region of £30,000 to £35,000 extra to construct. Whilst we do not suggest these levels are pushed down, it is clear that once a developer takes into consideration other contributions and possibly a Community Infrastructure Levy (CIL), the development could be unviable to build. This in turn causes a decrease in house building and housing targets will not be met. The GNDP must take this into consideration when appraising new developments, and in some cases where viability is an issue, other contributions may be reduced.

Joint Core Strategy Proposed submission Document

O - 11162 - 8464 - Policy 4: Housing delivery - ii, iii

11162 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: McCarthy & Stone Retirement Lifestyles Ltd. [8464] **Agent:** The Planning Bureau Ltd. (Mr. Matthew Shellum) [8463]

Full Text: Objective 12 aims to involve as many people as possible in new planning policy, this would include meeting the housing needs of older people which would meet the Spatial Vision set out in Paragraph 4.3. Paragraph 21 of PPS3 and the government's National Strategy for an Ageing Society both call upon local planning authorities to deal with the housing needs of older persons through specific local development framework policies. The Housing Delivery policy and supporting text is ambiguous on how it is intended to meet those needs. One of the tests of soundness in PPS12 is effectiveness, and for a policy to be effective in needs to be deliverable. The policy as worded is not sufficiently clear to ensure that the increasing older persons housing needs of all tenures including private specialised housing will be met. Paragraph 5.27 indicates that provision will be made for specialised retirement housing but it is unclear whether this through the Council being proactive and allocating sites through any future site allocations DPD or whether it is hoping that this type of housing will be delivered by the market. It is considered that the policy is unsound as it would not effectively deliver housing to meet the needs of the area, in particular specialised housing for older people which there is a growing need for.

Summary: The policy does not properly address the housing needs of older people as required to do so by Paragraph 21 of PPS3 and the National Strategy for an Ageing Society. Housing needs of older people extend to the provision private sector accommodation not just mixed tenure social extra care housing developments. It is considered that the policy is unsound as it would not effectively deliver housing to meet the needs of the area, in particular specialised housing for older people which there is a growing need for.

Joint Core Strategy Proposed submission Document

O - 11201 - 8500 - Policy 4: Housing delivery - i, ii

11201 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Mr Hugh Ivins [8500]

Agent: Mr Hugh Ivins [8500]

Full Text: There appears to be no difference in respect of the requirement to provide an element of affordable housing inside or outside the NPA within the GNDP Area. The economics of provision are significantly different to land prices and the provision of site services. The demand or need for affordable housing within the NPA must be different to that outside the NPA but within the GNDP Area. No assessment appears to have been done to examine the different scenarios and to come up with a affordable housing policy that reflects the differences in need for affordablehousing and respective development costs.

Summary: There appears to be no difference in respect of the requirement to provide an element of affordable housing inside or outside the NPA within the GNDP Area. The economics of provision are significantly different to land prices and the provision of site services. The demand or need for affordable housing within the NPA must be different to that outside the NPA but within the GNDP Area. No assessment appears to have been done to examine the different scenarios and to come up with a affordable housing policy that reflects the differences in need for affordablehousing and respective development costs.

Joint Core Strategy Proposed submission Document

O - 11245 - 8547 - Policy 4: Housing delivery - i, ii, iii

11245 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

1 not justified
2 not effective
3 inconsistent with national policy
GNP published its Strategic Housing Market Assessment in 2007, based on work undertaken earlier that year. Market conditions have changed significantly since 2007 and the report must be considered to be out of date. As such the target of 40% affordable housing cannot be relied upon. National policy (PPS1 para. 29) requires that an assessment of economic viability is undertaken to support affordable housing targets. Whilst the intention in the policy to take into account viability in site specific circumstances is to be welcomed, national policy requires that in setting a target account is taken of viability. A High Court challenge to the Blyth Valley Core Strategy was upheld on the grounds that such an assessment had not been undertaken despite this being a core element of Government policy. In the absence of such an assessment the policy is unsound and the affordable housing targets should be deleted. We acknowledge that the East of England Plan allows for targets to be set which are higher than that included within Policy H2. It should also be noted that the EEP allows for lower targets to be set dependent upon local circumstances. We accept that there is a need for affordable housing within the NPA, however, given that the SHMA was undertaken before the recent and dramatic fall in house prices, the evidence base cannot be said to be robust or credible.

Summary:

That part of the policy which relates to affordable housing policy should be deleted. The existing local plan policies should remain extant until replaced by a policy based on a robust and credible evidence base, including a re-assessment of the housing market to take into account current market conditions and an assessment of viability.

Joint Core Strategy Proposed submission Document

O - 11249 - 7224 - Policy 4: Housing delivery - None

11249 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Friends Family and Travellers (Planning) (Mr S J Staines) [7224] **Agent:** N/A

Full Text: Whilst TLRP generally support the thrust of this policy in as much as it seeks to commit the constituent authorities to make provision for residential and transit pitches for Gypsies and Travellers we must object because the wording does not fully reflect RSS Policy H3. This policy requires local authorities to make minimum allocations - "local authorities should make provision for at least 1237 net additional residential pitches..." This should be reflected in the Housing Delivery Policy.

Summary: Plan is unsound because it is not consistent with national policy.

Joint Core Strategy Proposed submission Document

O - 11279 - 7224 - Policy 4: Housing delivery - None

11279 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Friends Family and Travellers (Planning) (Mr S J Staines) [7224] Agent: N/A

Full Text:

Summary: Plan is unsound because it is not consistent with national policy. Whilst TLRP generally support the thrust of this policy inasmuch as it seeks to commit the constituent authorities to make provision for residential and transit pitches for Gypsies and Travellers we must object because the wording does not fully reflect RSS Policy H3. This policy requires local authorities to make minimum allocations - "Local authorities should make provision...for at least 1,237 net additional residential pitches..." This should be reflected in the Housing Delivery Policy.

Joint Core Strategy Proposed submission Document

O - 11283 - 2373 - Policy 4: Housing delivery - ii

11283 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Persimmon Homes (Anglia) [2373]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

We support the proposal to plan for more than the target set out in the East of England Plan both to meet the 15 year housing land requirement of PPS3 and to ensure that sufficient housing is delivered within the plan period. Whilst there is a requirement for 40% affordable housing within this policy, there is an element of flexibility built-in where the it states that: "In negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue financial support will be sought via public subsidy, such as through the Homes and Communities Agency (HCA)." However, it does not state that the Council will accept a lesser percentage of affordable housing as a result of economic viability. It simply states that account will be taken of economic viability and public funding will be sought. This could have serious repercussions on the delivery of affordable housing because public funding may not be forthcoming and therefore no affordable housing will be delivered if a 40% target is insisted upon. The policy as currently worded does not specifically allow the Councils to accept a lesser percentage of affordable housing. We acknowledge that this is allowed for in paragraph 5.29 of the supporting text but we consider this is of such significance that it should be contained within the policy wording.

Joint Core Strategy Proposed submission Document

O - 11321 - 6826 - Policy 4: Housing delivery - i, ii

11321 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

Reason: Not justifiedThe JCS is not being compliant in extending the timescale for housing site allocations beyond 2021, to 2026. This pre-empted the RSS Review, not due for completion until 2011. All indications are that an additional and lower scenario for housing and economic growth should be considered in the process, not least for the implications of the recession and longer term economic outlook, for a plan that was progressed and adopted in the boom period of 2001-08. The allocation of housing to 2026 has been 'justified' on the grounds of what PPS3 says on forward allocation of land for 5, 10 and 15 year periods. The last five years does not require a firm allocation, only an indication that it can be done through the JCS review. Even then, the land supply 'shelf-life' should be determined with the existing and likely forward rate of building, and not exaggerated by an unachievable target figure. Most bodies accept that RSS targets will not be met for various reasons, including the depressed state of the construction industry, the fall in land values, and developers waiting for the housing market to improve.

Reason: Not effectiveThe GNDP strapline for the JCS is 'Jobs, homes, prosperity for local people'. The stated need for the JCS is that upwards of 40% of all housing provided should be affordable housing, and the RSS target is 35% across the region. The period 2001-08 saw an improvement over previous years, but for the Greater Norwich area it averaged out at 22% (Norwich 28%, South Norfolk 18%, and Broadland 15%). The relatively high level in Norwich might come in part from a boom of buy-to-let flats, and direct subsidy as a Growth Point. For the rest of Norfolk, the North Sub-area averaged at 7%, with 12% in the final year; and for Yarmouth, 6% reaching 7% in the final year. For the region as a whole the average was 18%.The figures show a very poor delivery record for affordable housing in relation to need and the region target. As regards the housing that is built, it is not local people who are the main beneficiaries. The GNDP are setting an overall target of 40% in an effort to improve the situation and declare that 'Where viability is an issue financial support via public subsidy will be sought, such as through the Homes and Communities Agency (HCA)'. Given that the problem is national as well as regional and considering the Strategy's present priorities and policies, as well as the current economic outlook, it seems that once again there will be a very large gap between 'sought' and 'received'.We note in the affordable housing approach, in an effort to raise the level, the number set for a contribution is taken as five houses instead of 15 stated by PPS3. This is laudable in trying to make some progress within the existing system, particularly for rural areas, albeit that the 15 year land supply PPS 3 is taken too rigidly.

Throughout the JCS, references are made to 'maximising' or 'giving priority' to the use of brownfield over greenfield land. As such, the statements should be supported by providing the total numbers of each within the NPA for the 9,681 dwellings completed with the period 2001-08, the 11,847 committed at 2008, the 11,472 allocated to 2021 (based on current proposals) and the 8,800 extra allocations from 2021 to 2026 (based on current proposals). A similar breakout should be shown for the rural parts of Broadland and South Norfolk (the 'Outside NPA' figures). This data would help to gauge the effectiveness of the policy in practice.

Finally, the housing trajectory in Appendix 6 requires at least some justification as to how the annual estimates for the period 2008/09 to 2025/26 are derived, and the assumptions which underpin them.

Joint Core Strategy Proposed submission Document

O - 11334 - 8570 - Policy 4: Housing delivery - i, ii

11334 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 4 fails the Justified and, Effective soundness tests because the Affordable Housing elements of it are inflexible and impose a current standard for the entire plan period, without the ability to negotiate lower targets, based on scheme viability and lack of public subsidy. Reasons: Hethersett Land Ltd notes that the policy requires the target for affordable housing to be 40% on qualifying sites. This goes beyond the RSS "indicative" target of 35%. Whilst Hethersett Land Ltd notes that the viability of delivering the target is part of the negotiation process, the Policy's only flexibility is to seek public subsidy to fund any viability gap. However, there is no provision for flexibility in the event that public funding is not achieved. This may render development proposals undeliverable. Hethersett Land Ltd suggest that provision should be made for negotiations to include the option of reducing the affordable housing target and/or revising the tenure split, where it can be demonstrated schemes and undeliverable and public subsidy is not available. Hethersett Land Ltd draws the GNPs attention to the Persimmon vs Blyth Valley case, which highlights the need for Development Plan Policies to take account of viability and delivery. Policy 4 also requires a proportion of gypsy and traveller pitches to be provided as part of large scale development proposals. However, there is no evidence to demonstrate that this is the most appropriate approach particular given the current strategy in South Norfolk where is to identify Gypsy and Traveller sites away from settled population, apparently in line with their needs and requirements.

Joint Core Strategy Proposed submission Document

O - 11345 - 8234 - Policy 4: Housing delivery - i, ii, iii

11345 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary:

The blanket approach of requiring 40% of housing within all schemes is not appropriate for this urban/rural area. Provision rates need to more appropriately reflect the local needs/housing markets and the viability of schemes. Whilst the policy indicates that financial assistance for on-site affordable housing may be possible in some instances, affordable housing should be suitably located to benefit future occupiers and Social Registered Landlords for maintenance purposes. There does not appear to have been any Viability Assessments undertaken in relation to the provision of affordable housing. This needs to be included within the evidence base in order to justify the levels set. Without a robust assessment this part of the Core Strategy cannot be considered sound. This basis was set out through the Blythe Valley Core Strategy Inquiry (2008) and reinforced in the Hinckley & Bosworth Core Strategy Inquiry (2009). In the latter, the Inspector insisted upon an independent assessment (distinct from Council and objector evidence) being undertaken to thoroughly consider the impact of affordable housing requirements on the viability of proposals.

Joint Core Strategy Proposed submission Document

O - 11355 - 2373 - Policy 4: Housing delivery - i, iii

11355 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary:

The target of 40% is unsound as it is not justified by an up to date needs assessment evidence, (the most recent is dated June 2006) nor by viability assessment evidence, as required by PPS3 and the need for which is further confirmed by the judgement in Permission Homes (North East) Ltd, Barratt Homes Limited, Millhouse Developments Ltd v Blyth Valley BC. Viability is a particularly pertinent issue in the current difficult market conditions. The statement in the Housing Topic Paper that experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions, is not substantiated by detailed evidence and is in any case not clear evidence of viability. The policy wording also does not provide sufficient flexibility to enable applicants to negotiate to provide a reduced percentage or off-site provision in circumstances where other site specific considerations/abnormal costs/economic viability make the provision of 40% affordable housing unviable (whereas paragraphs 5.29 of the accompanying text and 4.8 of the Housing Topic Paper do address this matter.) The policy wording should therefore be amended to remove the reference to having a 40% target at the adoption of the strategy and to incorporate the final part of paragraph 5.29 "in exceptional circumstances..." "open book" approach. "The requirement for mixed tenure Housing with Care as part of the overall provision in the major growth locations must also have regard to the marketability and viability of providing such housing especially where it is non-market and therefore effectively an additional element of affordable housing.

Joint Core Strategy Proposed submission Document

O - 11361 - 8047 - Policy 4: Housing delivery - i

11361 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: **Wroxham Parish Council (Mrs Daphne Wyatt)**
[8047]

Agent: **N/A**

Full Text:

Summary: There is a Historic need for affordable housing in Norwich and its' suburbs, due largely to the selling off of the agricultural workers housing for second homes etc. This does not justify building the proposed number of houses in Greater Norwich, affordable homes should be built where they are needed, in the rural parts of the County.

Joint Core Strategy Proposed submission Document

O - 11367 - 8627 - Policy 4: Housing delivery - i, ii

11367 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: We have a number of objections to Policy 4. The Stage 8 Strategic Housing Land Availability Assessment was published in Sept 2009 which is supposed to inform policy on housing. It did not inform the decisions on previous consultation phases of the plan when housing options were considered, therefore the evidence base for housing options could not have been justified or supported by the STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT. It would appear that the STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT attempts to justify the strategy retrospectively. Lack of information for submitted option The Strategy to accommodate major housing growth in the Norwich Policy Area - Topic Paper (November 2009) (STRATEGY TO ACCOMMODATE MAJOR HOUSING GROWTH) pages 4 to 8 summarises the evolution of the housing options. It is important to note (4th paragraph of p. 7) that the officer's favoured option at 18th Dec 2008, following substantial consultation and based on the evidence available at that time, was Option 1 as set out in the Regulation 25 Technical Consultation which differs substantially to that contained in the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission version. The only justification provided for moving from the Officers' recommended option to the submitted option (tabled by South Norfolk which eventually became the submitted option) was that it presented "a better fit with the existing settlement character and pattern of South Norfolk, but also that it presented 'significant challenges'" (Joint Core Strategy for Broadland, Norwich and South Norfolk Strategy to Accommodate Major Housing Growth in the Norwich Policy Area Topic Paper (Sept 2009) p.7). No evidence base was produced to test this changed distribution or whether the alleged impacts were real or politically motivated in the Joint Core Strategy for Broadland, Norwich and South Norfolk Reg 25.2009. South Norfolk Council (SNC) had intended that reliance to be placed on 2,000 - 5,000 units at the Mangreen new settlement before 2026, but the "Critical Friend" PINS Review of the Joint Core Strategy for Broadland, Norwich and South Norfolk (PreRJCS) presented on 19th Feb 2009 criticised this assumption and it was withdrawn. The submitted option is therefore not justified by the evidence base and the only option that is justified by the evidence base, and the results of public consultation, is Option 1 (Dec 2008). Failure to deliver 5 year housing supply and 2021 housing targets In sections 1.0, 2.0 and 4.0 of the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) the challenge identified is to meet the housing requirement between 2008 and 2026. This is not correct. The appropriate challenges are to demonstrate an adequate 5 year housing supply (Planning Policy Statement 3, Para 70); identify a further supply of specific, developable sites for years 6-10 and, where possible, for years 11-15 (Planning Policy Statement 3, Para 55). The roll forward to 2026 to provide for a 15 year supply of housing from the approval of the Local Development Frame in 2011 is no justification for not meeting the East of England Regional Spatial Strategy housing targets to 2021 and the above Planning Policy Statement 3 requirements. In doing so, the plan will have provided for a flexible but deliverable housing land supply. We demonstrate in Appendix 1 of this report that the East of England Regional Spatial Strategy housing targets cannot be met. This is in part indicated in the trajectory for the Norwich Policy Area (Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009), Appendix 8) as further demonstrated in our detailed representations at (Appendix 1) as well as being highlighted by the recent Secretary of State Appeal decision on Norwich Common (located in Appendix 2). The chart located in Appendix 8 of the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) details the Norwich Policy Area housing trajectory based on the growth scenario 2a (the "favoured option"). The Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) indicates that all yearly completions, except for 2007/2008, have fallen considerably short of the annualised target, which means a backlog has been built up which will need to be addressed in future years, as indicated by the "manage" trajectory contained in the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009). According to the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) this backlog will be addressed mainly in the years 2014/15 to 2019/20. This represents a high degree of back-loading of the housing supply which increases the risk that the East of England Regional Spatial Strategy target by 2021 will be missed. This risk is considered to be even greater given the lack of provision for a credible contingency plan within the Joint Core Strategy should certain key growth location sites not come forward. Our further representations highlight concerns pertaining to key infrastructure upon which several of the growth locations are highly dependent in order to realise the East of England Regional Spatial Strategy housing target. This will have a potentially disastrous impact on bringing forward the right number of homes and calls into question the "soundness" of the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009). A separate detailed report on the housing trajectory is located in Appendix 1 to our fully detailed representations. Summary of soundness of housing trajectory (main report in Appendix 1) Our main concerns with respect to the housing trajectory are summarised below. Barton Willmore Planning have been carefully monitoring the land supply position in the Norwich Policy Area for more than six years. Barton Willmore Planning worked closely with Officers of the three Local Planning Authorities forming the Greater Norwich Development Partnership to evaluate the land supply position during the 2nd and 3rd quarters of 2008 to reach a robust position as of 1 April 2008. The position on land delivery in the context of a 5 year land supply as at 1st April 2008 for the Norwich Policy Area based on trajectories contained in the Joint Core Strategy for Broadland, Norwich and South Norfolk (p.109) is calculated as 4.30 years supply. It can be seen the Joint Core Strategy for Broadland, Norwich and South Norfolk opens its position with an inadequate supply of housing land to satisfy the tests laid down in PPS3. Consequently planning applications are to be considered favourably. Further Tests Following the methodology

Joint Core Strategy Proposed submission Document

11367 Object

CHAPTER 5 Policy 4: Housing delivery

detailed above, Barton Willmore Planning have tested the 5 year land supply position based on the trajectories set out in the Joint Core Strategy for Broadland, Norwich and South Norfolk through each year to 2021. In summary, the trajectories indicate that from April 2011 there is a continuous 5 year supply of land, if the desired trajectories are achieved. However, the trajectories contained in the JCPS have not been arrived at as a result of detailed enquiry or discussion with stakeholders within the industry and there is no evidence base setting out as to who has been party to or contributed to the trajectories. Therefore the trajectories only constitute a view of the three Local Authority Members of the Greater Norwich Development Partnership, formulated from reports and findings of Officer Groups. This is limited and probably tends to over-estimate completions from large sites. Barton Willmore Planning do not agree with the findings/trajectories contained in the JCPS. Barton Willmore Planning provide comparative forecasts and conclude that too much reliance has been placed on completions arising from the Rackheath Eco-Town settlement far too early in the plan period together with too many annual completions being forecast from this development. This development is affected by access constraints and requires substantial infrastructure to be in place in the early years.

In addition, no allowance has been made, in any form, for any 'fall out' arising from the non delivery of 'commitments' at 1st April 2008. Here, little consideration appears to have been given to reduced site capacities resulting from a shift in development away from 'flatted projects', particularly in the City area (as shown in the Greater Norwich Housing Market Assessment (Sept 2007)). In summary, and on the basis of a sound analysis of the likely delivery and timing and site releases, Barton Willmore Planning are of the view that the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) will fail to deliver a continuous 5 year supply of developable land and the plan will fail to deliver the requirement of the East of England Regional Spatial Strategy to 2021 and the 2026 forecast requirement contained in the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009). It would be wrong to await the outcome of this process when the opportunity arises now to make amendments to the housing distribution strategy.

Joint Core Strategy Proposed submission Document

O - 11382 - 8574 - Policy 4: Housing delivery - i, ii

11382 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Mr Paul Rogers [8574]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood)
[7175]

Full Text:

Summary:

Paul Rogers contends that Policy 4 fails the Justified and Effective soundness tests because elements of it are inflexible as it seeks to impose current standard for affordable housing for the entire plan period, and limits the ability to negotiate lower targets. Paul Rogers notes that the policy requires the target for affordable housing to be 40% on qualifying sites. This goes beyond the RSS indicative targets of 35%. Whilst we can accept that there may be a higher housing need in Greater Norwich, there needs to be a sufficiently flexible approach to provision, based on development viability. We note that the viability of delivery is part of the negotiation process, its only flexibility is to seek public subsidy to fund the viability gap. However there is no provision for flexibility in the event that public funding is not achieved. This may render development proposals undeliverable. Provision should be made for negotiations to include the option of reducing the affordable housing target and/or revising the tenure split, where it can be demonstrated that schemes are undeliverable and public subsidy is not available. We note that the affordable housing target for a recent permission at Norwich Common Wymondham in South Norfolk was only 25% based on viability reasons. Paul Rogers refers the GNDP to the Persimmon versus Blythe Valley case that highlighted the need for viability to be a consideration in determining policy targets. The GNDP evidence base for 40% is not robust. The Housing Topic Paper (Nov 2009) states that the 40% target was tested during the Broadland Local Plan. However it is worth noting that the Broadland Local Plan Inquiry was held in 2005 (adopted 2006) when land values were higher than now and therefore sites were more likely to be viable. It is our understanding that major sites in Broadland which were committed at that time, such as Blue Boar Lane, Sprowston (1233 dwellings) are still undeveloped. It is our understanding that the S106 for this site is still not signed, principally due to the 40% affordable housing provision and consequent concerns about the viability of the overall package of contributions. This is an example of the way in which the proposed policy could stymie delivery of housing development.

Joint Core Strategy Proposed submission Document

S - 11389 - 8595 - Policy 4: Housing delivery - None

11389 Support

CHAPTER 5 Policy 4: Housing delivery

Respondent: Mr Charles Birch (Trustees of the Gurloque Settlement, et al) [8595]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We endorse the approach in Policy 4 that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to secure a framework to accommodate housing in the period 2008-2026. Given the wording of Policy H1 of the East of England Plan, a minimum of 47,500 dwelling completions must be achieved across the GNDP area in the period 2001-2026. Of that figure, a minimum of 41,800 completions should be sought in the Norwich Policy Area in the period 2026. On that basis, we acknowledge the observation in the table at page 43 of the PSD that there is a need to identify "new" land to accommodate approximately 20,275 dwellings in the NPA in the period 2026. The East of England Plan is being reviewed and it will necessarily take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty. It will be necessary for the Joint Core Strategy to establish a sound sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase. Paragraph 33 of PPS3 refers to the process of determining an appropriate level of housing. One of the issues to be taken into account is the Government's latest published household projections. The 2006-based household projections were published by CLG in March 2009 and suggest an increase of 114,000 households in Norfolk in the period 2006-2026. By way of comparison, the housing provision established in the East of England Plan for Norfolk anticipates the construction of 83,120 dwellings in the period 2006-2026. Thus, the Government's most recent household projections do anticipate a significant increase above the dwelling requirement presently to be found in the East of England Plan. Given this context, we endorse the comment at paragraph 5.24 of the PSD regarding the promotion of more housing than required to ensure EEP targets are met. The East of England Plan anticipates the construction of 40,000 dwellings in Broadland/Norwich/South Norfolk in the period 2006-2026. The 2006 based household projections suggest an increase of 48,000 households across the GNDP area suggest a housing requirement figure greater than that described in the tabulation at page 43 of the PSD. The Joint Core Strategy will need to be sufficiently robust to accommodate an increase in housing provision assigned to the Norwich Key Centre for Development and Change in the review of the EEP to 2031. In order to deliver the planned housing growth, large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area will be needed. We discern the value of planned urban extensions of a moderate scale, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich. The achievement of the necessary housing delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. Not only is it important to ensure that new housing is supported but essential community facilities/infrastructure but it is also equally vital to confirm that the proposed urban extensions are integrated with the existing built up area of Norwich, not physically/socially divorced from it. The new development areas must exhibit a strong degree of interaction with the existing urban area if the objectives enshrined in Policy NR1 of the East of England Plan are to be fulfilled. We agree with Policy 4 which indicates that allocations will be made to ensure that at least 33,000 new homes can be delivered in the Norwich Policy Area between 2008 and 2026. We endorse the extent of the NPA as shown in Appendix 4. The evidence base demonstrates that the requirement for affordable housing varies across the NPA. Accordingly, Policy 4 is inflexible by suggesting the adoption of an affordable housing target of 40% across the NPA as a whole. We are, however encouraged but the comment at Policy 4 that "in negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue financial support will be sought via public subsidy." Paragraph 5.24 of the PSD states that the JCS promotes slightly more housing than required to ensure the requirement established in the East of England Plan is implemented. We would observe that the housing figures to be found in the EEP are to be regarded as "minimum targets to be achieved, rather than ceilings which should not be exceeded." Furthermore, the approach adopted by the GNDP ensures that the JCS is sufficiently flexible to enable it to deal with changing circumstances. We would note that paragraph 5.28 of the PSD states that "the EEP has a regional target of 35% of all housing to be affordable and recognises higher targets may be required locally. The findings of the most recent housing needs assessment for the three districts indicates that 43% of overall housing need can only be met by affordable housing." We would observe that the need for affordable housing varies across the NPA and in that context, it is inappropriate to seek to apply to all sites in the NPA the average that is derived for the NPA as a whole.

Joint Core Strategy Proposed submission Document

O - 11435 - 8254 - Policy 4: Housing delivery - i, ii

11435 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Kier Land Ltd [8254]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood)
[7175]

Full Text:

Summary:

Kier Property contends that Policy 4 fails the JUSTIFIED and EFFECTIVE soundness test because elements of it are inflexible as it seeks to impose a current standard for affordable housing for the entire plan period, and limits the ability to negotiate lower targets. Kier Property notes that the policy requires the target for affordable housing to be 40% on qualifying sites. This goes beyond the RSS 'indicative' target of 35%. Whilst we can accept that there may be higher housing need in Greater Norwich there needs to be a sufficiently flexible approach to provision, based on development viability. We note that the viability of delivery is part of the negotiation process, its only flexibility is to seek public subsidy to fund the viability gap. However, there is no provision for flexibility in the event that public funding is not achieved. This may render development proposals undeliverable. Provision should be made for negotiations to include the option of reducing the affordable housing target and/or revising the tenure split, where it can be demonstrated that schemes are undeliverable and public subsidy is not available. The GNDP evidence base for 40% is NOT ROBUST. The Housing Topic Paper (Nov 09) states that the 40% target was tested during the Broadland Plan. However it is worth noting that the Broadland Local Plan Inquiry was held in 2005 (adopted 2006) when land values were higher than now and therefore sites were more likely to be viable. It is our understanding that major sites in Broadland, which were committed at that time, such as Blue Boar Lane, Sprowston (1233 dwellings), are still undeveloped, the S106 for this site is still not signed, principally due to the 40% affordable housing provision and consequent concerns about the viability of the overall package of contributions. This is an example of the way in which the proposed costly delivery of housing development. We also note that the affordable housing target for a recent permission at Norwich Common, Wymondham in South Norfolk was only 25% based on viability to be a consideration in determining policy targets.

Joint Core Strategy Proposed submission Document

O - 11436 - 8222 - Policy 4: Housing delivery - i

11436 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Gladedale (Anglia) Ltd [8222]

Agent: RPS (Cambs office) (Ms Kathryn Money) [7662]

Full Text:

Summary:

The target of 40% is unsound as it is not justified by an up to date needs assessment evidence (most recent dated June 06) nor by viability assessment evidence as required by PPS3 and the need for which is confirmed by the judgement in Persimmon Homes (North East) Ltd v Blyth Valley BC. Viability is a particularly pertinent issue in the current market conditions. The statement in the Housing Topic Paper that experience locally shows that 40% is the max achievable on sites without subsidy, in normal market conditions, is not substantiated by detailed evidence and is in any case not clear evidence of viability. The policy wording also does not provide sufficient flexibility to enable applicants to negotiate to provide a reduced percentage or off-site provision in circumstances where other site specific considerations / abnormal costs / economic viability make provision of 40% affordable housing unviable (whereas paras 5.29 of the accompanying text and 4.8 of the Housing Topic Paper do address this matter).

Joint Core Strategy Proposed submission Document

O - 11446 - 1797 - Policy 4: Housing delivery - i

11446 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Great & Little Plumstead Parish Council (Mr I Bishop) [1797] Agent: N/A

Full Text:

Summary: Denudation of villages and the migration of people, especially young people because of the lack of affordable homes and employment is a major problem that needs to be addressed. The National Housing Federation recently reported, quote: "Traditional village life could be eradicated within a generation as the cost of country living drives young people into cities" it goes on to state: "More than 100,000 under 35's are expected to migrate from villages and market towns across England to urban areas by 2010". We have to stop this. These policies will lead to conurbation with all the associated problems. This report/consultation document does not "predict" growth in this sector, so much as "prescribes" it and uses as a justification the need for affordable homes.

Joint Core Strategy Proposed submission Document

O - 11495 - 8589 - Policy 4: Housing delivery - i

11495 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary: The second issue concerns the soundness of the strategy and there are a number of points to be made. The first point is, on what basis the housing need was established. It appears to have been set by the East of England Regional Authority on some arbitrary basis out of statistics produced by the Government. This top down process has been imposed on our Councils who appear not to have challenged the assumptions or the basis for their construction. This in itself is undemocratic as the EERA is a quango in which a large proportion of members have no Local Authority mandate. It is in any case due to be abolished in 2010, having burdened Norfolk with the prospect of building over 5,500 houses per annum for the next 20 years, i.e. 113,000 additional houses. This is wholly disproportionate as are the assumptions made in this strategy.

Joint Core Strategy Proposed submission Document

S - 11512 - 8592 - Policy 4: Housing delivery - None

11512 Support

CHAPTER 5 Policy 4: Housing delivery

Respondent: Mr Charles Birch (Trustees of the Trafford Trust Estate) [8592] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: Policy 4 housing delivery We agree that the JCS should provide the strategic policy framework to ensure that appropriate allocations are made to achieve at least 36,740 new dwelling completions in the period 2008-2026. Wroxham is located beyond the defined extent of the NorPA shown in Appen 4. As such Wroxham will contribute to the housing requirement established (Page43) for those areas situated beyond the boundary of the NPA. It is recognised that a proportion of affordable housing will be required in the context of sites containing 5+ dwellings. We would question within policy 4 that .. "at the adoption of this strategy the target is 40% based on the most recent assessment." As noted in Para5.28, the EoE Plan "has a regional target for 35% of all housing to be affordable and recognises higher targets may be required locally". We would observe that the need for affordable housing does not arise in a uniform manner across the area being covered by the JCS. We endorse para 5.24. Furthermore we agree that "the JCS promotes slightly more housing than required to ensure EEP targets are met" The EoE Plan states that housing figs contained at policy H1 are min targets to be achieved not ceilings. We note Para 5.24 and consider Wroxham has the capacity to accommodate at least 200 dwellings in a location that will not have a detrimental/negative impact on the broads.

Joint Core Strategy Proposed submission Document

O - 11519 - 8591 - Policy 4: Housing delivery - i

11519 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We agree with Policy 4 which indicates that allocations will be made to ensure that at least 33,000 new homes can be delivered in the Norwich Policy Area between 2008 and 2026. We endorse the extent of the NPA as shown in appendix 4. Long Stratton is plainly part of the NPA. The evidence base demonstrates that the requirement for affordable housing varies across the NPA. Accordingly, policy 4 is inflexible by suggesting the adoption of an affordable housing target of 40% across the NPA as a whole. We are, however encouraged by the comment at Policy 4 that "in negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the viability of provision. Where viability is an issue financial support will be sought via public subsidy." Please see paragraph 5.24 of the PSD. We would observe that the housing figures to be found in the EEP are to be regarded as "minimum targets to be achieved, rather than ceilings which should not be exceeded." Furthermore, the approach adopted by the GNDP ensures that the JCS is sufficiently flexible to enable it to deal with changing circumstances. Please see paragraph 5.28 of the PSD. We have noted that 43% was the calculated short term need, including the pre-existing backlog, and the data indicated a somewhat lower ongoing need. We would observe that the need for affordable housing varies across the NPA and in that context it is inappropriate to seek to apply to all sites in the NPA the short term average that was derived for the NPA as a whole. The affordable housing requirement for Norwich is greater than that for South Norfolk.

Joint Core Strategy Proposed submission Document

O - 11520 - 7653 - Policy 4: Housing delivery - ii

11520 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary: Policy 4 Housing deliveryNfk Constabulary objects to this question on the following grounds:-The scale of the development within the districts has the potential to impact on police resources which can include the need for additional capital investments in new police facilities and funding for additional police officers and police staff. See comments made in relation to policy 20 -implementation

Joint Core Strategy Proposed submission Document

O - 11523 - 8300 - Policy 4: Housing delivery - ii

11523 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Phillip Jeans Homes Ltd [8300]

Agent: Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text:

Summary:

Policy 4 Housing delivery states that provision will be made for at least 36,740 new homes between 2008 and 2026 within the NPA. This figure stems from the Regional Spatial Strategy (RSS) for the East of England. Proposals for housing will be expected to contribute to the mix of housing required to '... provide balanced communities and meet the needs of the area, as set out in the most up to date study of housing needs and/or market assessment'. In negotiating the proportion and tenure of affordable housing, account must be made of site characteristics, market conditions and the overall viability of the scheme. For this reason the level of affordable housing provision sought for any individual scheme must be considered on a site by site basis. The client is proposing 35% affordable housing on the site at Georges Lane.

Joint Core Strategy Proposed submission Document

O - 11538 - 8597 - Policy 4: Housing delivery - i, ii

11538 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living contends that policy 4 fails the JUSTIFIED and EFFECTIVE soundness test because elements of it are inflexible as it seeks to impose a current standard for the entire plan period and limits the ability to negotiate lower targets. Blue Living notes that the policy requires the target for affordable housing to be 40% on qualifying sites. This goes beyond the RSS 'indicative' target of 35%. Whilst we note that the viability of delivering the target is part of the negotiation process, its only flexibility is to seek public subsidy to fund the viability gap. However there is no provision for flexibility in the event that public funding is not achieved, which may render the development undeliverable. Provision should be made for negotiations to include the option of reducing the affordable housing target and/or revising the tenure split where it can be demonstrated schemes are undeliverable and public subsidy is not available. Blue Living considers that the allocation of land itself does not directly supply, it will be the market together with price mechanism. Key to deliverability will be realistic interpretation of the levels of mixed use. Integrated affordable housing at a proportion which is realistic and which protects longer-term interests will provide an optimum development. Negotiations in determining the proportion of affordable housing, including tenure mix, should also take account of a site's characteristics e.g. where sites present themselves in highly accessible locations but which have significant start up/remediation costs. The issue addressed here is about more than numbers and proportions. If walkable, cycleable neighbourhoods are to be created with appropriate social, physical and green infrastructure, the costs of much of that too will have to be met by developer/investor. There has to be cross-development proportionality and that simply cannot be effectively promoted by imposing high levels of affordable housing even if there is demonstrable need. The policy also requires a proportion of gypsy and traveller pitches to be provided as part of large-scale development proposals. However there is no evidence to demonstrate that this is the most appropriate approach particularly given the current strategy in Braodland where it is to identify Gypsy and Traveller sites away from settled population, apparently in line with their needs and requirements.

Joint Core Strategy Proposed submission Document

S - 11554 - 8603 - Policy 4: Housing delivery - None

11554 Support

CHAPTER 5 Policy 4: Housing delivery

Respondent: BLanmar 1 LLP [8603]

Agent: Woods Hardwick Planning (Mr Tim Collie) [7449]

Full Text:

Summary: Policy 4 relates to housing delivery and states that 33,000 homes will need to be provided within the Norwich Policy Area in the period 2008-2026. We would support this Policy as it is line with teh East of Englan Plan and seeks to provide housing in an area with substantial existing and planned infrastructure. We would however highlight that the NNDR is key to providing this growth, and its construction should be given priority in order to achieve the minimum provision as set out by the core strategy.

Joint Core Strategy Proposed submission Document

O - 11560 - 8268 - Policy 4: Housing delivery - None

11560 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: RSPB (East of England Regional Office) (Dr Philip Pearson) [8268] Agent: N/A

Full Text:

Summary:

The Council states that the 'plan is ambitious' and their 'aspirations are high'. This approach understandable given the need to balance the development requirements laid out in the Regional Spatial Strategy against the considerable constraints created by designated sites, the need for improved infrastructure and the on-going changes within the Local Authority System. The Council must ensure, that their ambitious approach does not negatively impact on important sites for nature conservation. We have a number of concerns over the plan as it stands. All impacts on Natura 2000 sites must be carefully screened (refer to sect.1 and 2 annex to this letter) to ensure that the proposed level of growth is possible especially when in-combination impacts of neighbouring Council's plans are taken into consideration. Throughout the Core Strategy it is stated that the Norwich Area Transport Strategy (NATS) 'is fundamental to the delivery of this strategy'. It is important to note that the NATSS is dependent on the construction of the Norwich Northern Distributor Road (NDR) but funding has not been secured for this project and is not guaranteed in the future and adverse impacts to the River Wensum Special Area of Conservation must be avoided. If the NDR is not deliverable this will require a significant revision of the NATS and the JCS. If the NATS is not deliverable then the housing delivery (POLICY 4) and the strategic growth in the Norwich Policy Area may be threatened. This significant uncertainty undermines the soundness of the current plan.

Joint Core Strategy Proposed submission Document

O - 11600 - 8203 - Policy 4: Housing delivery - i, ii, iii

11600 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Country & Metropolitan Homes - formerly
Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes contends that Policy 4 fails the Justified, Effective and Consistency with National Policy soundness tests because elements of it are not sufficiently flexible as the policy approach seeks to impose a current standard for the entire plan period, limits the ability to negotiate lower targets to ensure deliverability and is seeking a level of provision which exceeds existing regional policy. C&M Homes notes that the policy requires the target for affordable housing to be 40% on qualifying sites. This goes beyond the RSS "indicative" target of 35%. Whilst C&M Homes notes that the viability of delivering the target is part of the negotiation process, its only flexibility is to seek public subsidy to fund the viability gap. However, there appears to be no provision for flexibility within the policy in the event that public funding is not achieved. This may render development proposals undeliverable. Provision should be made for negotiations to include the option of reducing the affordable housing target and/or revising the tenure split, where it can be demonstrated that schemes are either not deliverable or public subsidy is not available which makes the development unviable.

Joint Core Strategy Proposed submission Document

O - 11606 - 8607 - Policy 4: Housing delivery - i, ii, iii

11606 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that the limitation of 300 dwellings only at Aylsham is founded on nothing but a cursory consideration of an arbitrary division of housing requirement figures and infrastructure capacity analysis, specifically sewage. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth in Aylsham is provided. Our client's land interest is the site at Sir Williams Lane, Aylsham which is capable of accommodating up to 500 dwellings and supporting infrastructure. By limiting the scale of growth at Aylsham to 300 dwellings the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.

Summary: Policy 4 - Housing Delivery states what provision will be made for new homes between 2008 and 2026. This figure stems from the RSS for the East of England. Proposals for housing will be expected to contribute to the mix of housing required to "...provide balance communities and meet the needs of the area, as set out in the most up to date study of housing need and/or housing market assessment." In negotiating the proportion and tenure of affordable housing, account must be made of site characteristics, market conditions and the overall viability of the scheme. For this reason the level of affordable housing provision sought for any individual scheme must be considered on a site by site basis. The client is proposing to provide 35% affordable housing on the site.

Joint Core Strategy Proposed submission Document

S - 11636 - 7523 - Policy 4: Housing delivery - None

11636 Support

CHAPTER 5 Policy 4: Housing delivery

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The affordable housing target of 40% is supported.

Joint Core Strategy Proposed submission Document

O - 11648 - 4685 - Policy 4: Housing delivery - i

11648 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Mr Peter Adams [4685]

Agent: Tetlow King Planning (Ms Rachel Coles) [8611]

Full Text:

Summary:

We welcome the reference to housing with care in Policy 4 however, we are highly doubtful that this policy will deliver the housing with care that is necessary to meet the identified need within the Districts and in particular South Norfolk. We are disappointed that the policy refers to care needs generally and does not refer to specific need to address housing with care for older people. There is a wealth of Government Policy on the ageing population and emphasis is placed on how the housing and care needs of older people can be addressed both now and in the future. In particular the Government publication „Lifetime Homes, Lifetime Neighbourhoods (February 2008) states that "over the 25 years to 2029, the population aged 75 years and older is projected to rise by 47 per cent in urban areas, and by 90 per cent in rural areas." This highlights the importance of provision of housing and care for older people and in particular the urgent need in rural areas such as South Norfolk. We consider that the policy needs to be worded specifically and should guide development for the future in a way which allows development to meet the specific and identified need of older people within the Districts. There should be a range of housing and care options on offer throughout the Plan area and incorporating a variety of tenures to meet identified needs. We consider that there is a need to provide housing and care schemes which are developed separately to the general housing provision (C3) within Districts. Housing, care schemes can range from Use Class C2, C3 and Sui Generis and each development proposal should be considered on its individual merits and the details of the schemes are scrutinised. We consider that the settlements which are identified within Policy 4 for the development of housing with care schemes is too restrictive. As stated above there is expected to be a larger increase in older people within rural areas than urban areas. The settlements identified within the policy are mainly urban locations. We consider that there should be provision of housing with care throughout all Districts and not simply the Districts identified within the Policy. In the event that it is felt necessary to specify locations Diss should be added, we consider that it is anomalous that Diss is not already listed being a large settlement within South Norfolk. We would like to recommend that the following policy wording is substituted for the Housing with Care section within Policy 4. We would also like to request that the title is changed from Housing with Care to Housing and Care (Use Class C2, C3 and Sui Generis): "Housing and Care" A range of housing and care options (Use Class C2, C3 and Sui Generis of all tenures) especially those to meet the needs of the elderly, will be required throughout the Plan area in both urban and rural locations."

Joint Core Strategy Proposed submission Document

O - 11652 - 8366 - Policy 4: Housing delivery - i, ii, iii

11652 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. In previous representations, the BLT commented that a Strategic Housing Market Assessment should inform policy 4 (then policy 14) in terms of housing mix. We note that the policy is not specific in terms of the mix of housing required in new developments but this should reflect the most up to date Housing Market Assessment. Based on the existing Housing Market Assessment (2006/07-2010/11), there are surpluses in most sizes of properties in the area, other than one bed affordable units (both socially rented and intermediate) and four bed socially rented units. As such, it is considered that the policy gives sufficient flexibility in the mix of housing that is incorporated in major developments, recognising that major growth areas should incorporate a range of housing types to ensure that balanced and sustainable communities. The BLT therefore broadly supports this part of the policy. Affordable Housing. In previous representations, the BLT have raised the point that there is limited economic viability assessment to support the policy in terms of the threshold above which affordable housing will be required and the level of affordable housing that will be sought. PPS3 states that, taking into consideration the findings of the Strategic Housing Market Assessment and other local evidence, LPAs should set a target for the amount of affordable housing to be provided. This target should also reflect the likely economic viability of land for housing within the area (paragraph 29), which applies the principle that LPAs should take into account market information when developing housing policies (paragraph 11). The Council have determined to take forward a policy which requires developments of five or more dwellings to provide affordable housing and that a target of 40% will be the level of affordable housing that will be sought. The evidence on which the Council relies for this policy approach is their 2006/07 Housing Needs Survey. However, no assessment of the economic viability of the land for this threshold or level of affordable housing has been undertaken, which is contrary to the guidance set out in PPS3. The failure to comply with PPS3 in this regard has led to High Court judgements against the Local Planning Authority with respect to the soundness of their Core Strategies, most notably in *Persimmon Homes (North East) Ltd v Blyth Valley BC* [2008]. In this case, the Court of Appeal quashed policies on affordable housing targets as contained in Blyth Valley Borough Council's Core Strategy as they were found not to be in compliance with PPS3. It should be noted that this Core Strategy was prepared and the case against it brought forward at a time when the guidance in PPS3 was still relatively new. This is, of course, not the position now as the guidance in PPS3 was published in November 2006 and, therefore, has been in force for some considerable time. In the light of current market conditions, it is considered that the Council should adopt an alternative policy to reflect the findings of an economic viability assessment, which suggests realistic levels of affordable housing that will be sought in the GNDP area. The BLT are concerned that the lack of an up to date economic viability assessment threatens the soundness of the plan on the basis that it is not justified and potentially not effective. As such, the BLT recommend that the GNDP undertake an economic viability assessment and amend this part of policy 3 accordingly. Finally, the policy suggests that 'where viability is an issue financial support will be sought via public subsidy, such as through the Homes and Communities Agency.' This therefore suggests that when assessing viability, the assumption will be that grant funding is not available. This seems like a prudent approach as it is unrealistic to assume that grant funding will exist as the actual availability and the level of public subsidy will not be known at the outset. A standard approach is to include mechanisms within relevant section 106 agreements to change the level of affordable housing in the event that grant funding is available. It is considered that this policy is clear on these points to make sure that the strategy is flexible to changing circumstances, therefore ensuring its deliverability.

Joint Core Strategy Proposed submission Document

S - 11653 - 8366 - Policy 4: Housing delivery - None

11653 Support

CHAPTER 5 Policy 4: Housing delivery

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: (Policy 4 paragraph 5.24) Please see attached representations Paragraph 5.24 states that the amount of housing for which is land remains to be allocated is set out in the table on page 43. However, this is not correct in that 7,000-10,000 homes have been allocated to the Old Catton/Sprowston/Rackheath/Thorpe St Andrew Growth Triangle as set out in policy 10 and in Appendix 5. This paragraph needs to be amended to reflect this. In addition, this paragraph also states that the JCS promotes slightly more housing than required to ensure EEP targets are met. However, in order to plan for growth in a co-ordinated way, it is considered that this paragraph should state that large scale housing development will be prioritised in the identified growth areas.

Joint Core Strategy Proposed submission Document

O - 11684 - 8352 - Policy 4: Housing delivery - i, ii, iii

11684 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary:

The background evidence to the Joint Core Strategy includes a Stage 2b Water Cycle Study (WCS) carried out by Scott Wilson, dated September 2009. However, to date this document is still in draft form. We understand that further amendments will be made which unfortunately will not be in time for this consultation process. The housing allocations presented in the Joint Core Strategy (JCS) are not consistent with those considered in table 3-1 of the (draft (Sept 09)) WCS. The (draft (Sept 09)) WCS does not therefore provide directly relevant evidence to inform the development of the JCS. Nonetheless, the (draft (Sept 09)) WCS has not demonstrated that 36740 homes can be delivered by 2026 in accordance with the Policies for Places or Policy 3 of this Core Strategy. Specifically, it has not demonstrated that water quality will be "protected or improved" as required by Policy 3. Based on the evidence presented in the (draft (Sept 09)) WCS, the proposed level and distribution of housing would result in failure to meet the requirements of the Water Framework Directive (WFD) and Habitats Directive (HD) (to prevent deterioration in water quality and meet water quality standards). We note that the task 2 Appropriate Assessment states that it is highly unlikely that there will be significant direct and indirect impacts on Natura 2000 sites from the JCS alone due to the requirement to comply with the WFD. However, it is not clear from the evidence how this might be achieved. In addition, the Appropriate Assessment does not reference the requirements of the Habitats Directive (HD) in relation to treated effluent discharge and water abstraction, the requirements of which are more stringent than those of the WFD. Indeed, we do not consider that, in its current form, the Appropriate Assessment fully supports the Joint Core Strategy. It does not consider the outcomes of the Environment Agency Review of Consents, nor does it consider the findings of the Greater Norwich WCS. On finalisation of the WCS, the Appropriate Assessment will need to be reviewed. To accommodate the full level of proposed housing and meet the requirements of the above Directives, several Waste Water Treatment Works (WwTW) will need to improve the degree to which they treat foul water beyond what is currently regarded as 'best available technology not exceeding excessive costs' (BATNEEC). The level of treatment that would be required, whilst technically feasible, is currently regarded as being cost prohibitive. Currently, it is not known what level of growth can be accommodated within the Greater Norwich area within the constraints of the required WFD and HD standards and within BATNEEC. Also, it is not known whether the limitation of BATNEEC can be overcome to enable the full level of proposed growth and if so, the delivery mechanisms, including phasing, that would be required. Finally, if the limitations cannot be overcome, it is not clear whether there are suitable alternatives available to ensure that the plan is flexible. We acknowledge that policy 3 requires water infrastructure to be in place to ensure that water quality and areas of environmental importance are protected. However, it has not been demonstrated how this can be achieved. In light of all of the above, we deem the Core Strategy to be unsound in that it is not justified, effective or consistent with National Policy. The content of the DPD is not justified by appropriate evidence. Although we recognise that further work is currently being undertaken, the stage 2b WCS is yet to be completed. The draft version currently demonstrates that the planned growth cannot be accommodated in the aspired levels/locations without detrimental impacts on the requirements of both the WFD and HD. Furthermore, it should be recognised that it may not be possible to overcome the current perceived negative cost-effectiveness of increasing the treatment capability (beyond BATNEEC) of the WwTW to accommodate the increase in number of houses to be served. It is therefore not clear whether the housing growth is deliverable in full and whether the Core Strategy can be deemed effective. The importance of ensuring there is adequate infrastructure is recognised by national planning policy. Planning Policy Statement (PPS) 1: Delivering Sustainable Development states that there is a requirement to base policies on a 'recognition of the limits of the environment to accept further development without irreversible damage' (paragraph 19). The PPS 1 Supplement: Planning and Climate Change confirms that in selecting land for development, consideration needs to be given to the 'capacity of existing and potential infrastructure' with specific mention of sewage and sewerage (paragraph 24). Furthermore, PPS 12: Local Spatial Planning (paragraph 4.8) requires Local Planning Authorities to support policies with evidence of the infrastructure requirements required to facilitate proposed development and, at a regional level, the East of England Plan (RSS 14) addresses the issue of water quality in policy WAT 2. It requires, 'a co-ordinated approach to plan making should be developed through a programme of water cycle and river cycle studies to address the issues of water supply, water quality, wastewater treatment and flood risk in receiving watercourses...'. To date the stage 2b WCS has not been completed. Therefore the extent of the issues surrounding sewage treatment is not fully understood and cannot be fully explored within the Core Strategy conflicting with the quoted aims of the PPS 1 supplement, PPS 12 and the East of England Plan. Furthermore, the (draft (Sept 09)) WCS study has demonstrated that the proposed growth in full may have a detrimental impact on water quality in the District. This is therefore in conflict with the quoted aim of PPS 1. In light of this, we feel that the Core Strategy is not in compliance with National Policy.

Joint Core Strategy Proposed submission Document

O - 11698 - 5316 - Policy 4: Housing delivery - i

11698 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: M Sida [5316]

Agent: N/A

Full Text:

Summary: Para. 5.27 Wider Area Policies (Housing Allocations chart on page 43) Under the tables headed New Allocations to 2026 & New commitment to 2026 (Columns h & i). The total for SN (NPA) & SN (outside NPA) seems to indicate that the amount of housing allocated to this district component is 42% of the total of 37,750 the total area. The EEP - Greater Norwich Sub-Area - Part 2, PARA 4.5, Climate change and flood risk, estimates that the percentage Carbon emissions (CO2) for Road Transport in South Norfolk is 41% (far more than Broadland 28% and Norwich 14%). The per capita emissions in tonnes are 8.56 for South Norfolk & 7.61 for Broadland & 6.51 for Norwich. The higher allocation of housing in the SN council area will have the disproportionate effect of increasing the carbon emission of the whole area. In my estimation to about 8.0. This is about 0.4 higher than currently is the area average (8.09). In terms of environment sustainability, allocating a large proportion of the housing requirement to the South Norfolk Council area is not justified.

Joint Core Strategy Proposed submission Document

S - 11725 - 8363 - Policy 4: Housing delivery - None

11725 Support

CHAPTER 5 Policy 4: Housing delivery

Respondent: Taylor Wimpey Developments & Hopkins Homes [8363] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: We endorse the approach in Policy 4 that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to secure a framework to accommodate housing in the period 2008-2026. Given the wording of Policy H1 of the East of England Plan, a minimum of 47,500 dwelling completions must be achieved across the GNDP area in the period 2001-2026. Of that figure, a minimum of 41,800 completions should be sought in the Norwich Policy Area in the period to 2026. On that basis, we acknowledge the observation in the table at page 43 of the PSD that there is a need to identify 'new' land to accommodate approximately 20,275 dwellings in the NPA in the period to 2026. The East of England Plan is being reviewed and it will necessarily take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty. It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase. Paragraph 33 of PPS3 refers to the process of determining an appropriate level of housing. One of the issues to be taken into account is the Government's latest published household projections. The 2006-based household projections were published by CLG in March 2009 and suggest an increase of 114,000 households in Norfolk in the period 2006-2026. By way of comparison, the housing provision established in the East of England Plan for Norfolk anticipates the construction of 83,120 dwellings in the period 2006-2026. Thus, the Government's most recent household projections do anticipate a significant increase above the dwelling requirement presently to be found in the East of England Plan. Given this context we endorse the comment at paragraph 5.24 of the PSD regarding the promotion of more housing than required to ensure EEP targets are met. The East of England Plan anticipates the construction of 40,000 dwellings in Broadland/Norwich/South Norfolk in the period 2006-2026. The 2006-based household projections suggest an increase of 48,000 households across the GNDP area in the period 2006-2026. As with Norfolk as a whole, the latest household projections for the GNDP area suggest a housing requirement figure greater than that described in the tabulation at page 43 of the PSD. The Joint Core Strategy will need to be sufficiently robust to accommodate an increase in housing provision assigned to the Norwich Key Centre for Development and Change in the review of the EEP to 2031. In order to deliver the planned housing growth, large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area will be needed. We discern the value of planned urban extensions of a moderate scale, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich. The achievement of the necessary housing delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. Not only is it important to ensure that new housing is supported by essential community facilities/infrastructure but it is also equally vital to confirm that the proposed urban extension are integrated with the existing built-up area of Norwich, not physically/socially divorced from it. The new development areas must exhibit a strong degree of interaction with the existing urban area if the objectives enshrined in Policy NR1 of the East of England Plan are to be fulfilled. We agree with Policy 4 which indicates that allocations will be made to ensure that at least 33,000 new homes can be delivered in the Norwich Policy Area between 2008 and 2026. We endorse the extent of the NPA as shown in Appendix 4. The evidence base demonstrates that the requirement for affordable housing varies across the NPA. Accordingly, Policy 4 is inflexible by suggesting the adoption of an affordable housing target of 40% across the NPA as a whole. We are, however, encouraged by the comment at Policy 4 that "in negotiating the proportion and tenure of affordable housing, account will be taken of site characteristics and the economic viability of provision. Where viability is an issue financial support will be sought via public subsidy". Paragraph 5.24 of the PSD states that the JCS promotes slightly more housing than required to ensure the requirement established in the East of England Plan is implemented. We would observe that the housing figures to be found in the EEP are to be regarded as "minimum targets to be achieved, rather than ceilings which should not be exceeded". Furthermore, the approach adopted by the GNDP ensures that the JCS is sufficiently flexible to enable it to deal with changing circumstances. We would note that paragraph 5.28 of the PSD states that "the EEP has a regional target of 35% of all housing to be affordable and recognises higher targets may be required locally. The findings of the most recent housing needs assessment for the three districts indicate that 43% of overall housing need can only be met by affordable housing." We would observe that the need for affordable housing varies across the NPA and, in that context, it is inappropriate to seek to apply to all sites in the NPA the average that is derived for the NPA as a whole.

Joint Core Strategy Proposed submission Document

O - 11727 - 8607 - Policy 4: Housing delivery - i, ii, iii

11727 Object

CHAPTER 5 Policy 4: Housing delivery

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607]

Agent: Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that up to 250 dwellings should be allocated at Mulbarton. Presently the settlement is earmarked for between 10 - 20 dwellings as it is classified as a Service Village under Policy 15 of the JCS. We consider this figure is founded on nothing but a simple averaging exercise rather than a considered approach to capacity. The submitted JCS does nothing to explain why the housing figures in Policy 15 have been divided in this way and no reasoned justification for the proposed level of growth within these Service Villages. We believe there should be two levels of Service Village, Minor and Major. The Minor Service Villages have extremely limited services and should not receive any growth, whilst the Major Service Villages such as Mulbarton should receive a much higher allocation. Furthermore the 1,800 dwellings to be allocated to smaller sites in South Norfolk should be taken into consideration, meaning Major Service Villages such as Mulbarton should receive in the region of 250 dwellings.

Summary: Policy 4 - Housing Delivery states that provision will be made for at least 36,740 new homes between 2008 and 2026 within the Norwich Policy Area (NPA). This figure stems from the Regional Spatial Strategy (RSS) for the East of England. Proposals for housing will be expected to contribute to the mix of housing required to "...provide balance communities and meet the needs of the area, as set out in the most up to date study of housing need and/or housing market assessment." 5.4 In negotiating the proportion and tenure of affordable housing, account must be made of site characteristics, market conditions and the overall viability of the scheme. For this reason the level of affordable housing provision sought for any individual scheme must be considered on a site by site basis. The client is proposing to provide 35% affordable housing on the site at George Lane.

Joint Core Strategy Proposed submission Document

S - 11158 - 8455 - Policy 5: The Economy - None

11158 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Cemex Uk Operations Ltd (Kirstie Hannaford-hill) **Agent:** N/A
[8455]

Full Text: It is important to support and safeguard existing infrastructure and employment areas. Regeneration and new development should be promoted but not at the cost of removing existing strategically placed industrial development and employment hubs. Safeguarding zones around Costessey Plant, Norwich Riverside Depot and Flixton plant and similar plants should be identified within a minimum of 250m stand off.

Summary: It is important to support and safeguard existing infrastructure and employment areas. Regeneration and new development should be promoted but not at the cost of removing existing strategically placed industrial development and employment hubs. Safeguarding zones around Costessey Plant, Norwich Riverside Depot and Flixton plant and similar plants should be identified within a minimum of 250m stand off.

Joint Core Strategy Proposed submission Document

O - 11224 - 8542 - Policy 5: The Economy - i, ii, iii

11224 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The East of England Plan seeks the provision of 35,000 jobs over the period 2001 - 2021, an annual average of 1,750. The East of England forecasting model (autumn run) predicts job growth of 20,900 in the period 2008 - 2026. This is considered to be unduly pessimistic given the high unemployment rates and levels forecast for the end of the plan period - the model predicts annual unemployment of 8,900 or 3.3% in 2026 compared to 4,500/1.9% in 2008 and 3,900/1.7% in 2004. A pro-growth strategy has been put in place by the East of England Plan. It would be perverse if that pro-growth strategy planned for a higher level of unemployment than before the adoption of the East of England Plan. It should be an aim of the Core Strategy to plan for the delivery of sufficient jobs to return to the pre-recession levels of unemployment. In addition, beyond 2021 household growth continues at broadly the same rate as the period to 2021. Given the importance of Greater Norwich to the regional economy and the presence of key economic drivers such as financial services and knowledge-based industries, the jobs target of 27,000 is considered to be too low. The employment topic paper itself identifies job growth of 28,000 over the period 2010 to 2026. In order to reduce unemployment back to levels experienced before the recession, an additional 4,500 jobs should be added, to provide a target of 32,500 jobs over the period 2008 - 2026.

Summary:

It should be an aim of the Core Strategy to plan for the delivery of sufficient jobs to return to the pre-recession levels of unemployment. Given the importance of Greater Norwich to the regional economy and the presence of key economic drivers such as financial services and knowledge-based industries, the jobs target of 27,000 is considered to be too low. In order to reduce unemployment back to levels experienced before the recession, an additional 4,500 jobs should be added, to provide a target of 32,500 jobs over the period 2008 - 2026.

Joint Core Strategy Proposed submission Document

S - 11241 - 8540 - Policy 5: The Economy - None

11241 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Honingham Thorpe Farms LLP [8540]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

Support concept of Food and farming hub. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. In 2006 the Shaping the Future Partnership (a partnership of approximately 300 businesses and organisations spanning the private, public and voluntary sectors in Norfolk) commissioned Easton College and Bidwells to undertake a feasibility study into the concept of a Norfolk Food Hub. The study sought to outline the market need and opportunity for developing a food enterprise hub in Norfolk to showcase the food industry in Norfolk and East Anglia. The food hub is intended as a 21st century showcase for the Norfolk and East of England food and farming industries. It aims to: * be a focus for developing local food supply chains; * make a step change in the scale of the potential market for local producers; * generate new business ideas, which lead to a more successful and efficient food market and industry; * address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure; and * use state of the art environmental technologies to minimise environmental impact, reduce waste and costs. The Norfolk Food Hub represents a strategic opportunity to create a food cluster, bringing R&D institutions together with food processors and education institutions. It has the potential to provide more than local economic benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The food hub concept has the potential to: * make a step change in the scale of the potential market for local producers; * address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. * has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions; * support the policies of the RSS and RES; * support and further develop the knowledge economy through links with research and academic institutions; * build on the Region's existing clusters of knowledge based activity; * build on a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles; * develop a local asset in which the Region has a competitive advantage; * offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (Recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farm have the potential to fulfil this role as an exemplar of rural economic development. The Strategic Employment Sites (Arup, June 2009) identifies a required provision in the Norwich area for strategic sites for agriculture and food production.

Summary:

Support concept of Food & farming hub. The RES seeks to maintain the East of England as the UK's leader in agriculture and food sector. The Norfolk Food Hub represents a strategic opportunity to create a food cluster, bringing R&D institutions together with food processors and education institutions. It has the potential to provide more than local economic benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions.

Joint Core Strategy Proposed submission Document

S - 11259 - 8536 - Policy 5: The Economy - None

11259 Support

CHAPTER 5 Policy 5: The Economy

Respondent: The Big Prawn Company Ltd (Mr Sean O'Hanlon) Agent: N/A
[8536]

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as bio-fuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfill this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11270 - 4045 - Policy 5: The Economy - None

11270 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Brown & Co (Mr N. F. Saffell) [4045]

Agent: N/A

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfill this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11272 - 8546 - Policy 5: The Economy - None

11272 Support

CHAPTER 5 Policy 5: The Economy

Respondent: **Norfolk Farmhouse Icecream (Mr Simon Dann)** Agent: **N/A**
[8546]

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfill this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11281 - 8557 - Policy 5: The Economy - None

11281 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Anglia Farmers (Mr Clarke Willis) [8557]

Agent: N/A

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfill this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11304 - 8562 - Policy 5: The Economy - None

11304 Support

CHAPTER 5 Policy 5: The Economy

Respondent: National Farmers Union (Mrs Christine Hill) [8562] Agent: N/A

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The Recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in Policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity for developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and - address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of the premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (Recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfil this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- it has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials.

Joint Core Strategy Proposed submission Document

S - 11311 - 8566 - Policy 5: The Economy - None

11311 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Country Fresh Produce Ltd (Mr James Gunns)
[8566] **Agent:** N/A

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The Recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in Policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity for developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and - address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of the premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (Recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfil this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local health produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- it has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials.

Joint Core Strategy Proposed submission Document

S - 11313 - 6432 - Policy 5: The Economy - None

11313 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Easton College (Mr David Lawrence) [6432]

Agent: N/A

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The Recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in Policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity for developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and - address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of the premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (Recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfil this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local health produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- it has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials.

Joint Core Strategy Proposed submission Document

O - 11322 - 6826 - Policy 5: The Economy - i

11322 Object

CHAPTER 5 Policy 5: The Economy

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary: CPRE are supportive of the broad policy aims, but have concern over whether these can be achieved. There is an over-reliance on the continuing strength and growth in finance, commerce and retail in the NPA, sectors in which jobs may be vulnerable. Unduly high allocations of land for office space will impact on options for alternative uses for housing. Within the Greater Norwich Area as a whole there is a balance to be struck between continuing growth of tourism and major loss of amenity to local residents, pressure on infrastructure (water, transport); and changes in the character in towns and villages. The planned level of expansion at Broadland Gate Business Park cannot be justified;. It is a large scale out-of-town retail and commercial development which will encourage car dependency and compete with Norwich City centre.

Joint Core Strategy Proposed submission Document

O - 11335 - 8570 - Policy 5: The Economy - i, iii

11335 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 5 fails the Justified and National Policy soundness tests because elements of it are inconsistent with Policy NR1 of the East of England Plan, and do not properly reflect National Planning Policy.

Hethersett Land Ltd considers that the approach to employment within Policy 5 and, by implication policies 9 and 10, does not fully reflect Policy NR1 of RSS14 which specifically highlights Wymondham/A11 corridor as a focus for employment growth. Whilst employment growth at Wymondham and Hethel are clearly referred to within Policies 9 and 10, consistent with this approach, there is no specific reference to the strategic significance of the A11 corridor as a focus for growth in employment terms. In this respect therefore, the policy is not sound in that it is not consistent with the Secretary of State's policies within the East of England Plan and is not justified in that it is not the most effective strategy having regard to all reasonable alternatives. It is therefore considered that further emphasis should be given within Policy 5 (and by implication, policies 9 and 10) to reflect the strategic significance of the A11 corridor as a focus for employment growth, and by implication linked housing growth in accordance with Policy NR1 of RSS14.

Joint Core Strategy Proposed submission Document

S - 11344 - 8573 - Policy 5: The Economy - None

11344 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Norfolk Farm Vets Ltd (Ms Molly McKay) [8573] Agent: N/A

Full Text:

Summary:

Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agriculture engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity for developing such an enterprise in Norfolk in order to: -make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that business hubs can play and recommends that such hubs should be supported and that a programme of exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- it has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- It supports the policies of the RSS and RES;-The links with research and academic institutions will help support and further develop the knowledge economy;-It would build on the Region's existing clusters of knowledge based activity;-It involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;-It develops a local asset in which the Region has a competitive advantage;-It offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials.

Joint Core Strategy Proposed submission Document

O - 11370 - 8627 - Policy 5: The Economy - ii

11370 Object

CHAPTER 5 Policy 5: The Economy

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Failure to identify Regional Strategic and Sub-Regional Strategic employment sites of the criteria for identifying such sites in the NPAThe East of England Regional Spatial Strategy Policies E2 (employment in urban areas, market towns and key rural areas), E3 Strategic Employment Sites (Norwich to support regeneration and its role in bio-technology), E4 employment clusters (green technologies in Norwich linked to Cambridge motor sport at Hethel, multi-media linked to London-Norwich) should be transferred to the Local Development Framework in the form of sites or broad areas for employment development which have a particular purpose and which differentiate regional strategic from sub-regional strategic and other employment sites. Policy NR1 of the East of England Regional Spatial Strategy identifies the locations for employment growth which includes Wymondham/A11 Corridor (High technology and rail related). The Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) should identify which of these locations is to be of strategic scale or importance and which should be of sub-regional scale or importance and Objective 3 should be modified to reflect this approach. East of England Development Agency and East of England Regional Assembly commissioned Arup to produce a study on the identification and delivery of strategic employment sites in the Eastern Region. The study was published 23rd Nov 2009. The purposes of the study were to review current strategic sites (existing and planned) and to set out a new approach to future definitions, prioritization and delivery of such sites based on an understanding of future demand in order to inform Local Development Frameworks. The Arup study provides a useful definition of Regional Strategic Sites vis-à-vis Sub-Regional Strategic Sites. Each definition should be incorporated into the employment policies and sites for the two types of site should be identified in the JCPS. The definitions are as follows: Key characteristics of Regional Strategic Sites High quality sites which are attractive to national and international investors Have good road and public transport access A clear identity/brand and future vision for the site Should accommodate development, which could not equally be accommodated elsewhere Support specific sectoral need, e.g. knowledge based industries Key characteristics for Sub Regional Strategic Sites Good quality sites, which are attractive to businesses with sub-regional focus More likely to offer general employment space rather than sectoral Good road and public transport access Support wider East of England Regional Spatial Strategy/RES objectives, such as regeneration or creation of sustainable communities

Joint Core Strategy Proposed submission Document

O - 11385 - 3868 - Policy 5: The Economy - i, ii

11385 Object

CHAPTER 5 Policy 5: The Economy

Respondent: University of East Anglia (Mr Roger Bond) [3868] Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text:

Summary:

The University of East Anglia (UEA) considers Policy 5 to be unsound because it fails the Justified and Effective soundness tests. However, the UEA considers that the failure is not fundamental to the general intent of the policy and can be put right with non-substantive wording changes, to make specific reference to the UEA, and the need for a supportive framework to help it grow. Main Representation Policy 5 includes a list of the opportunities for innovation, skills and training and sets out how these will be expanded. It specifies the need to facilitate the expansion of higher education and also the support for enterprise hubs including the Norwich Research Park. Whilst, the University of East Anglia supports the general intent of Policy 5, it believes that given its crucial role locally, nationally, and internationally in facilitating and developing the knowledge based economy, the UEA should be specifically referred to within the bullets under the opportunities for innovation, skills and training section in the same manner as the enterprise hubs have been listed. The policy also fails to properly reflect the Regional Economic Strategy's emphasis on the UEA's role in the knowledge economy. This omission results in the policy not being the most appropriate strategy when considered against the alternatives and in light of the available evidence. It therefore fails the Justified Soundness Test. It also fails the Effective soundness test, because the omission results in an inconsistency with other parts of the plan, including Policy 9 which does mention the UEA. The GNDD needs to acknowledge the UEA's crucial role as a key element of their aspirations for Norwich's growth to be based on a thriving knowledge based economy. It also needs to provide the UEA with a clear and appropriate spatial framework for accommodating its growth aspirations. The starting point is an appropriately supportive policy in the Joint Core Strategy. Suggested Change The JCS Policy 5 should be amended to include a specific reference to the UEA, acknowledging its importance and need for it to grow in order to make the most of its potential to help drive forward Norwich's knowledge based economy.

Joint Core Strategy Proposed submission Document

S - 11390 - 8595 - Policy 5: The Economy - None

11390 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Mr Charles Birch (Trustees of the Gurloque Settlement, et al) [8595]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We agree with the observation in Policy 9 of the PSD that the focus for major growth and development will be the Norwich Policy Area as defined in Appendix 4. Our Clients equally support the proposition that further employment development is envisaged at strategic locations, including Cringleford/Colney. The Spatial Vision of the PSD acknowledges that significant change will arise in the area covered by the Joint Core Strategy in order to accommodate the requirements for new homes and jobs established in the East of England Plan. The vision anticipates investment at strategic and other employment locations, including Cringleford/Colney which will help create a stronger economy. Sufficient land for employment development will need to be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. Objective 5 states that the Norwich Research Park will be a focus of further employment growth in the Norwich Policy Area. Policy 12 of the PSD describes Cringleford and Colney as being part of the wider Norwich urban area. Policy 5, expects a significant expansion of employment opportunities in the general UEA/NRP area. Policy 2 of the PSD also anticipates at least 1,200 dwellings at Cringleford. It is important for the Joint Core Strategy to devise a framework which will enable the required degree of economic change to arise in the most effective manner. Whilst it is important to safeguard existing employment sites. It is equally necessary to allocate sufficient quantities of employment land of the appropriate quality and in the right locations to meet the needs of inward investment, new businesses and existing firms wishing to expand or relocate. Norwich City Centre will continue to exert a powerful economic influence over the Norwich Policy Area but significant locations at the edge of the City, such as the general area of the proposed Norwich gateway, will increasingly be required to facilitate the enhancement of the local economy. The quality of land to meet the needs of business is one of the critical factors in ensuring economic success and attracting inward investment. The Joint Core Strategy must ensure that there is a high quality offer of employment land to underpin the growth status of the Norwich area. In that wider context, Cringleford/Colney will be the focus of further employment growth.

Joint Core Strategy Proposed submission Document

S - 11440 - 8598 - Policy 5: The Economy - None

11440 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Ben Burgess Ltd (Mr Ben Turner) [8598]

Agent: N/A

Full Text:

Summary:

Re Para 5.4 policy 5 Agriculture and rural industries play a significant role in terms of land management, employment and GVA in the East of England & Norfolk. Over 75% of the land in East of England is used for farming and the region possesses a high number of businesses in food processing and the supply chain. The recognition to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in Policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies and be part of this important regional objective (Regional Econ Strategy)

Joint Core Strategy Proposed submission Document

O - 11460 - 8298 - Policy 5: The Economy - i, ii, iii

11460 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Honeyview Investments Limited [8298]

Agent: Emery Planning Partnership (Mr Rawdon Gascoigne) [8297]

Full Text:

Summary:

The specific part of Policy 5 this objection relates to is as follows:- "land identified for employment uses, whether existing or newly allocated, will only be considered for other uses that are ancillary and supportive to its employment role. Employment land with potential for redevelopment for other uses will be identified in supporting DPDs or SPDs" For clarity and ease of reference, we set out our objections to the policies tourism element in a separate representation. Legal Compliance In respect of the reference to supporting SPDs, we do not consider that it is adequate for the Core Strategy solely upon Supplementary Planning Documents that do not have to go through the same vigorous consultation and examination process as DPDs. We consider that this is inappropriate, contrary to PPS1 and PPS12 and raises questions of the legal compliance of the plan. This could also be considered to render the plan unsound. Soundness In order to be judged sound, the plan should be justified, effective, and consistent with national policy. Justified The policy should be based upon a robust and credible evidence base, and should comprise the most appropriate strategy when considered against the reasonable alternatives. The East of England Plan identifies a target of 35,000 for net growth in jobs for the period 2001-2021 in Greater Norwich. Policy 5 sets a target of 27,000 additional jobs between 2008-2026. Whilst the Core Strategy and subsequent DPDs have to take this target into account, we consider that there is a strong need for evidence, including economic evidence, for the production of the Core Strategy and LDF. Taking this into account, there is strong evidence that Greater Norwich already has an adequate supply of employment land to meet future requirements. On the employment land supply information itself there are the following documents available from which conclusions can be drawn: (i) Norfolk County Employment Land AMR 2006/7 (ii) Norwich LDF AMR 2007/8 (iii) GNPD Greater Norwich Employment Growth and Sites & Premises Study We have serious reservations over the approach of the Greater Norwich Employment Growth and Sites & Premises Study, in particular the recommendation in the document for an additional 229 Ha to be identified to meet the needs of the GNPA to 2026. The Norfolk AMR identifies that at 1st April 2007 within the GNPA there is around 249Ha of land which is undeveloped but which has planning permission. If the total land required to accommodate the growth to 2026 is taken on the basis of RSS household projections, then the total land area required is 1069Ha (of which 229Ha is in addition to that in active use now). However on the basis of the Greater Norwich Employment Growth and Sites & Premises Study there is presently 1104.5Ha of land which is either in active use now or available for development. On the basis of the above evidence, the policy presumption to safeguard land not currently in employment use for B1, B2 or B8 use is not required. We question the validity of the evidence base, and consider that analysis of the complete evidence base leads us to different conclusions regarding the current availability of employment land, the need to allocate further sites, and in particular the need to safeguard existing sites. We consider that the policy is not justified. On this basis, the policy does not meet the test of soundness. Effective To be effective, the core strategy must be shown to be deliverable and flexible. We consider that the policy effectively amounts to the safeguarding of employment land and existing allocations. As a result of restricting the uses of previously allocated employment sites, changes in the wider economic and policy conditions can result in sites becoming undevelopable and derelict in the future. Para 4.46 of PPS12 states "a strategy is unlikely to be effective if it cannot deal with changing circumstances." We consider that the approach of the DPD to effectively safeguard existing employment allocations would be inflexible, and the plan cannot therefore be considered to be effective. The safeguarding of certain sites may also preclude or frustrate the development of perfectly feasible alternative sites. This is could seriously hinder the deliverability of the plan. On the basis of the above, the policy does not meet the test of soundness. Consistent with national policy PPS1 identifies at paragraph 23 that plans should ensure that suitable locations are available for industrial, commercial, retail, public sector (e.g. health and education) tourism and leisure developments, so that the economy can prosper. As we have identified above, the safeguarding of certain sites may preclude or frustrate the development of perfectly feasible alternative sites, contrary to PPS1. Paragraph 23 of PPS1 also states that Local Planning Authorities should recognise that all local economies are subject to change; planning authorities should be sensitive to these changes and the implications for development and growth. We have identified above the inflexibility of the proposed policy approach. We consider that the proposed policy approach is therefore not in accordance with PPS1. The Draft PPS4: Consultation Paper on a New PPS 4: Planning for sustainable economic development went out for consultation in December 2007. Although a new PPS on prosperity could combine parts of four previous documents: PPG4, PPG5, PPS6, PPS7 and paragraphs 53, 54 and annex D of PPG13- the document makes a number of important points in relation to employment sites and development plans. The Draft PPS4 requires the needs of businesses to be recognised. Local planning authorities should facilitate a supply of land which would be able to cater for the differing needs to businesses and the expected employment needs of the whole community but which is flexible enough to be responsive to a changing economy or new business requirements. It clarifies that local authorities should avoid designating sites for single or restricted use classes wherever possible and avoid carrying forward existing allocations where this cannot be justified. The Draft PPS4 identifies at paragraph 24 that in recognising the needs of businesses, local planning authorities should ensure that site allocations for economic development do not simply carry forward existing allocations, particularly if they are for single or restrictive uses. If there is no reasonable prospect of a site being used for economic development during the plan period, the employment allocation should not be proposed or retained, and wider employment uses or alternative uses, such as housing, should be actively considered. The Draft PPS4: Summary of key issues and analysis of consultation responses document showed that 70% of respondents agreed that employment sites should not be retained as such if there is no reasonable prospect of them coming forward for development during the plan period. The Draft PPS4 is a material planning

Joint Core Strategy Proposed submission Document

O - 11460 - 8298 - Policy 5: The Economy - i, ii, iii

11460 Object

CHAPTER 5 Policy 5: The Economy

consideration, and there is clear evidence therefore that there is agreement with this logical approach. We consider that the proposed policy 5 is contrary to the principles of sustainable development as set out in PPS1, and that it fails to take into account the Draft PPS4. We therefore consider that the policy does not comply with national planning policy. On this basis, the policy does not meet the test of soundness.

Joint Core Strategy Proposed submission Document

O - 11464 - 8298 - Policy 5: The Economy - i, iii

11464 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Honeyview Investments Limited [8298]

Agent: Emery Planning Partnership (Mr Rawdon Gascoigne) [8297]

Full Text:

Summary:

The specific part of Policy 5 this objection relates to is as follows: "Tourism, leisure, environmental and cultural industries will be promoted. This will be assisted by: * encouragement for appropriate development including sustainable tourism initiatives" When adopted, the Core Strategy should be read 'as a whole'. It is a concern that the Core Strategy fails to make provision for hotel accommodation outside of Norwich City Centre, except for some small scale development in rural locations. Our objections here are made with this consideration in mind, and could have implications for policies 9, 11 and 12. For clarity and ease of reference, we set out our objections to the policies employment element in a separate representation. Soundness In order to be judged sound, the plan should be justified, effective, and consistent with national policy. Justified The policy should be based upon a robust and credible evidence base, and should comprise the most appropriate strategy when considered against the reasonable alternatives. The EGSPS forecasts a growth of 1,200 jobs in hotels and catering in the period 2007-2026. This identified need was accepted by a Planning Inspector at a recent appeal (Ref: APP/G2625/A/07/2049067). There is a need for additional hotel accommodation within Norwich. However, the need is not confined to the centre of the city only. In particular, there is a need for further accommodation on the western side of the city. There is also a need to provide accommodation to meet the requirements of businesses. This need should be met where the need arises. A balanced approach is required, including providing accommodation outside of the Norwich City Centre. On the basis that the need for accommodation is not confined to the city centre, it is therefore the case that the city centre is not always the most sustainable location for tourism related development, specifically hotel accommodation in connection with business tourism. We consider that the plan does not make provision for hotel accommodation where it is required. It does not take into account the evidence for this, and is therefore not justified. On this basis, it does not meet the test of soundness. Consistent with national policy The DCLG Good Practice Guide on Tourism states at paragraph 1.2 "Regional and local planning authorities in England should therefore have regard to the guidance in this document when preparing development plans." As well as a need for overnight accommodation for tourism, specifically set out in Policy E6 of the East of England Plan, there is a requirement to provide hotel accommodation for business travellers in Norwich. This need should be met in locations where the need to travel is reduced, for example in close proximity to business destinations. It is important to note that this does not necessarily require such development to be located in the town centre, as identified by the Good Practice Guide on Tourism. It is important that the Core Strategy provides for this need. We consider that the proposed paragraph is contrary to the Good Practice Guide on Tourism. We therefore consider that the policy does not comply with national planning policy. On this basis, the policy does not meet the test of soundness.

Joint Core Strategy Proposed submission Document

O - 11466 - 8298 - Policy 5: The Economy - i, ii, iii

11466 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Honeyview Investments Limited [8298]

Agent: Emery Planning Partnership (Mr Rawdon Gascoigne) [8297]

Full Text:

Summary:

The paragraph this objection relates to is as follows:- "5.39 A range and choice of employment sites are allocated and retained, including sites suitable for workshop and light industrial type uses" Specifically, we object to the use of the word retained within the paragraph. We have set out our objections to Policy 5 in a separate representation.

Paragraph 5.39 This objection should be read in conjunction with that objection. Soundness In order to be judged sound, the plan should be justified, effective, and consistent with national policy. Justified The policy should be based upon a robust and credible evidence base, and should comprise the most appropriate strategy when considered against the reasonable alternatives. The East of England Plan identifies a target of 35,000 for net growth in jobs for the period 2001-2021 in Greater Norwich. Policy 5 sets a target of 27,000 additional jobs between 2008-2026. Whilst the Core Strategy and subsequent DPDs have to take this target into account, we consider that there is a strong need for evidence, including economic evidence, for the production of the Core Strategy and LDF. Taking this into account, there is strong evidence that Greater Norwich already has an adequate supply of employment land to meet future requirements. On the employment land supply information itself there are the following documents available from which conclusions can be drawn: (i) Norfolk County Employment Land AMR 2006/7 (ii) Norwich LDF AMR 2007/8 (iii) GNDP Greater Norwich Employment Growth and Sites & Premises Study We have serious reservations over the approach of the Greater Norwich Employment Growth and Sites & Premises Study, in particular the recommendation in the document for an additional 229 Ha to be identified to meet the needs of the GNPA to 2026. The Norfolk AMR identifies that at 1st April 2007 within the GNPA there is around 249Ha of land which is undeveloped but which has planning permission. If the total land required to accommodate the growth to 2026 is taken on the basis of RSS household projections, then the total land area required is 1069Ha (of which 229Ha is in addition to that in active use now). However on the basis of the Greater Norwich Employment Growth and Sites & Premises Study there is presently 1104.5Ha of land which is either in active use now or available for development. On the basis of the above evidence, the policy presumption to safeguard land not currently in employment use for B1, B2 or B8 use is not required. We question the validity of the evidence base, and consider that analysis of the complete evidence base leads us to different conclusions regarding the current availability of employment land, the need to allocate further sites, and in particular the need to safeguard existing sites. We consider that the paragraph is not justified. On this basis, the it does not meet the test of soundness. Effective To be effective, the core strategy must be shown to be deliverable and flexible. We consider that the policy effectively amounts to the safeguarding of employment land and existing allocations. As a result of restricting the uses of previously allocated employment sites, changes in the wider economic and policy conditions can result in sites becoming undevelopable and derelict in the future. Para 4.46 of PPS12 states "a strategy is unlikely to be effective if it cannot deal with changing circumstances." We consider that the approach of the DPD to effectively safeguard existing employment allocations would be inflexible, and the plan cannot therefore be considered to be effective. The safeguarding of certain sites may also preclude or frustrate the development of perfectly feasible alternative sites. This is could seriously hinder the deliverability of the plan On the basis of the above, the paragraph does not meet the test of soundness. Consistent with national policy PPS1 identifies at paragraph 23 that plans should ensure that suitable locations are available for industrial, commercial, retail, public sector (e.g. health and education) tourism and leisure developments, so that the economy can prosper. As we have identified above, the safeguarding of certain sites may preclude or frustrate the development of perfectly feasible alternative sites, contrary to PPS1. Paragraph 23 of PPS1 also states that Local Planning Authorities should recognise that all local economies are subject to change; planning authorities should be sensitive to these changes and the implications for development and growth. We have identified above the inflexibility of the proposed policy approach. We consider that the proposed policy approach is therefore not in accordance with PPS1. The Draft PPS4: Consultation Paper on a New PPS 4: Planning for sustainable economic development went out for consultation in December 2007. Although a new PPS on prosperity could combine parts of four previous documents: PPG4, PPG5, PPS6, PPS7 and paragraphs 53, 54 and annex D of PPG13- the document makes a number of important points in relation to employment sites and development plans. The Draft PPS4 requires the needs of businesses to be recognised. Local planning authorities should facilitate a supply of land which would be able to cater for the differing needs of businesses and the expected employment needs of the whole community but which is flexible enough to be responsive to a changing economy or new business requirements. It clarifies that local authorities should avoid designating sites for single or restricted use classes wherever possible and avoid carrying forward existing allocations where this cannot be justified. The Draft PPS4 identifies at paragraph 24 that in recognising the needs of businesses, local planning authorities should ensure that site allocations for economic development do not simply carry forward existing allocations, particularly if they are for single or restrictive uses. If there is no reasonable prospect of a site being used for economic development during the plan period, the employment allocation should not be proposed or retained, and wider employment uses or alternative uses, such as housing, should be actively considered. The Draft PPS4: Summary of key issues and analysis of consultation responses document showed that 70% of respondents agreed that employment sites should not be retained as such if there is no reasonable prospect of them coming forward for development during the plan period. The Draft PPS4 is a material planning consideration, and there is clear evidence therefore that there is agreement with this logical approach. We consider that the proposed paragraph 5.39 is contrary to the principles of sustainable development as set out in PPS1, and that it fails to take into account the Draft PPS4. We therefore consider that the policy does not comply with national planning policy. On this basis, the policy does not meet the test of soundness.

Joint Core Strategy Proposed submission Document

O - 11466 - 8298 - Policy 5: The Economy - i, ii, iii

11466 Object

CHAPTER 5 Policy 5: The Economy

Joint Core Strategy Proposed submission Document

O - 11468 - 8298 - Policy 5: The Economy - i, iii

11468 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Honeyview Investments Limited [8298]

Agent: Emery Planning Partnership (Mr Rawdon Gascoigne) [8297]

Full Text:

Summary:

The specific part of paragraph 6.24 this objection relates to is as follows: "The city centre is the most sustainable location for major retail, leisure, office, culture and tourism related development in line with regional policy" Specifically, we object to the inclusion of 'tourism' within this sentence. Soundness In order to be judged sound, the plan should be justified, effective, and consistent with national policy. Justified The policy should be based upon a robust and credible evidence base, and should comprise the most appropriate strategy when considered against the reasonable alternatives. The EGSPS forecasts a growth of 1,200 jobs in hotels and catering in the period 2007-2026. This identified need was accepted by a Planning Inspector at a recent appeal (Ref: APP/G2625/A/07/2049067). There is a need for additional hotel accommodation within Norwich. However, the need is not confined to the centre of the city only. In particular, there is a need for further accommodation on the western side of the city. There is also a need to provide accommodation to meet the requirements of businesses. This need should be met where the need arises. A balanced approach is required, including providing accommodation outside of the Norwich City Centre. On the basis that the need for accommodation is not confined to the city centre, it is therefore the case that the city centre is not always the most sustainable location for tourism related development, specifically hotel accommodation. We consider that the paragraph is not justified. On this basis, it does not meet the test of soundness. Consistent with national policy The DCLG Good Practice Guide on Tourism states at paragraph 1.2 "Regional and local planning authorities in England should therefore have regard to the guidance in this document when preparing development plans." As well as a need for overnight accommodation for tourism, specifically set out in Policy E6 of the East of England Plan, there is a requirement to provide hotel accommodation for business travellers in Norwich. This need should be met in locations where the need to travel is reduced, for example in close proximity to business destinations. It is important to note that this does not necessarily require such development to be located in the town centre, as identified by the Good Practice Guide on Tourism. It is important that the Core Strategy provides for this need. We consider that the proposed paragraph is contrary to the Good Practice Guide on Tourism. We therefore consider that the policy does not comply with national planning policy. On this basis, the policy does not meet the test of soundness.

Joint Core Strategy Proposed submission Document

O - 11487 - 8057 - Policy 5: The Economy - ii

11487 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Re Policy 5 The Economy The highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road. The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

S - 11525 - 8591 - Policy 5: The Economy - None

11525 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We endorse the approach outlined in Policy 5, namely that the local economy will be developed in a sustainable way to support jobs and economic growth both in urban and rural locations. Paragraph of Appendix 3 of the Topic Paper entitled "Strategy to Accommodate Major Housing Growth in the Norwich Policy Area" notes that with South Norfolk Council and Saffron Housing located in Long Stratton, the employment base is considerably larger than would normally be expected in a settlement of this size. The existence of local employment opportunities is a factor underpinning the identification of Long Stratton as a suitable location for the accommodation of further housing. The spatial strategy for the NPA provides a sound basis for enhancing the employment base of Long Stratton. Policy 5 appropriately refers to the enhancement of employment opportunities not only at the strategic employment sites but also at other locations to meet identified need and provide for choice. We support the approach which indicates that the needs of small, medium and start-up businesses will be addressed through the allocation of new smaller scale employment sites and the retention of, and the potential expansion of, a range of existing employment sites across the area. There is an existing employment land allocation at Long Stratton and we endorse that part of Policy 5 which states that land identified for employment uses, whether existing or newly allocated, will only be considered for other uses that are ancillary and supportive to its employment role.

Joint Core Strategy Proposed submission Document

S - 11526 - 8300 - Policy 5: The Economy - None

11526 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Phillip Jeans Homes Ltd [8300]

Agent: Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text:

Summary: Policy 5 The Economy states that the local economy '... will be developed in a sustainable way to support jobs and economic growth both in urban and rural locations'. Phillip Jeans agree that achieving the full economic potential of the area is dependent on improved connectivity and implementation of wider sustainable transport proposals.

Joint Core Strategy Proposed submission Document

S - 11607 - 8607 - Policy 5: The Economy - None

11607 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that the limitation of 300 dwellings only at Aylsham is founded on nothing but a cursory consideration of an arbitrary division of housing requirement figures and infrastructure capacity analysis, specifically sewage. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth in Aylsham is provided. Our client's land interest is the site at Sir Williams Lane, Aylsham which is capable of accommodating up to 500 dwellings and supporting infrastructure. By limiting the scale of growth at Aylsham to 300 dwellings the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.

Summary: Policy 5 - The Economy states that the local economy "...will be developed in a sustainable way to support jobs and economic growth both in urban and rural allocations". Landform agrees that achieving the full economic potential of the area is dependent on improved connectivity and implementation of wider sustainable transport proposals.

Joint Core Strategy Proposed submission Document

O - 11654 - 8366 - Policy 5: The Economy - ii

11654 Object

CHAPTER 5 Policy 5: The Economy

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. The BLT broadly support policy 15. However, it is considered that the policy does not fully reflect the significance of Norwich's role in stimulating economic growth at a regional and national level. This message needs to be clear in the Joint Core Strategy if the level of job creation and business attraction/stimulation anticipated in the strategy is to be achieved. In particular, there is a need to consider the relationship between Norwich and the economic and housing market in Cambridge. The strategy needs to set out how strategic links and connections could be reinforced through the to enhance this relationship to benefit Norwich and its hinterland. Equally, consideration should be given to how Norwich can attract high value individual or corporate business to relocate to the area in order to underpin the growth strategy. This will have implications for how development in the Norwich Policy Area is terms of meeting local needs as well as creating places that will maintain and attract businesses to the city.

Joint Core Strategy Proposed submission Document

S - 11676 - 8615 - Policy 5: The Economy - None

11676 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Higgins Group (Mr Graeme Byers) [8615]

Agent: N/A

Full Text:

Summary:

Refers to Paragraph 5.40 Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as biofuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfill this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11703 - 8363 - Policy 5: The Economy - None

11703 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary: We concur with the comment at paragraph 5.37 of the PSD that the local economy has the potential to provide sufficient jobs to support the level of housing growth proposed and exceed EEP targets. We agree with Policy 5 that the local economy will be developed in a sustainable manner to support jobs and economic growth. This will provide for a rise in population and facilitate the change in economic activity anticipated in the East of England Plan. The EEP and the JCS refer to the significance of the strategic employment opportunities at Longwater and the Norwich Research Park. Costessey is extremely well related to those strategic employment areas and the local job opportunities at Bowthorpe. Further housing provision off Dereham Road would ensure a close and sustainable relationship between significant employment areas and new housing. Taylor Wimpey Developments and Hopkins Homes support the proposition that further employment is envisaged at strategic locations, including the consolidation of activity at Longwater (Policy 9 of the Proposed Submission Document). New housing should be accommodated in locations well related to the strategic employment sites and important local employment areas.

Joint Core Strategy Proposed submission Document

O - 11716 - 8618 - Policy 5: The Economy - i, ii

11716 Object

CHAPTER 5 Policy 5: The Economy

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary: Policy 5 refers to investment strategies focussing on overcoming constraints to the release and development of key sites. The policy should stipulate how this is to be achieved. The policy also refers to the rural economy and diversification and that it will support a preference for the re-use of appropriate redundant non-residential buildings for commercial uses. This is not necessarily a sustainable use of such premises as it may involve conversion and refurbishment at substantial cost to prospective occupiers and traffic generation from business uses can be at much higher levels than residential use. The inclusion of uses such as holiday homes to support the tourism industry is supported but if affordable housing is an acceptable alternative use then, in planning terms, so also must be market housing. The cost of conversions will in almost all cases rule out affordable housing provision.

Joint Core Strategy Proposed submission Document

S - 11728 - 8607 - Policy 5: The Economy - None

11728 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that up to 250 dwellings should be allocated at Mulbarton. Presently the settlement is earmarked for between 10 - 20 dwellings as it is classified as a Service Village under Policy 15 of the JCS. We consider this figure is founded on nothing but a simple averaging exercise rather than a considered approach to capacity. The submitted JCS does nothing to explain why the housing figures in Policy 15 have been divided in this way and no reasoned justification for the proposed level of growth within these Service Villages. We believe there should be two levels of Service Village, Minor and Major. The Minor Service Villages have extremely limited services and should not receive any growth, whilst the Major Service Villages such as Mulbarton should receive a much higher allocation. Furthermore the 1,800 dwellings to be allocated to smaller sites in South Norfolk should be taken into consideration, meaning Major Service Villages such as Mulbarton should receive in the region of 250 dwellings.

Summary: Policy 5 - The Economy states that the local economy "...will be developed in a sustainable way to support jobs and economic growth both in urban and rural allocations". Landform agrees that achieving the full economic potential of the area is dependent on improved connectivity and implementation of wider sustainable transport proposals.

Joint Core Strategy Proposed submission Document

S - 11732 - 8622 - Policy 5: The Economy - None

11732 Support

CHAPTER 5 Policy 5: The Economy

Respondent: East of England Development Agency (Mr Chris Knock) [8622] **Agent:** N/A

Full Text: THIS SUBMISSION WAS RECEIVED AFTER THE PUBLICATION STAGE ENDED

Summary: Refers to Paragraph 5.40 Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as bio-fuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfil this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11733 - 8624 - Policy 5: The Economy - None

11733 Support

CHAPTER 5 Policy 5: The Economy

Respondent: Smithfield Foods Ltd (Mr John Alton Jones) [8624] **Agent:** N/A

Full Text: THIS SUBMISSION WAS RECEIVED AFTER THE PUBLICATION STAGE ENDED

Summary: Refers to Paragraph 5.40 Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as bio-fuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfil this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

S - 11735 - 8626 - Policy 5: The Economy - None

11735 Support

CHAPTER 5 Policy 5: The Economy

Respondent: J W Allen & Sons Ltd (Mr Andy Allen) [8626]

Agent: N/A

Full Text: THIS SUBMISSION WAS RECEIVED AFTER THE PUBLICATION STAGE ENDED

Summary: Refers to Paragraph 5.40 Agricultural and rural industries play a significant role in terms of land management, employment and GVA in the East of England and Norfolk. Over 75% of the land in the East of England is used for farming and the Region possesses a high number of businesses in food processing and the supply chain. The importance of these industries increases to the north and east of the region. The recognition of the importance of such industries and the need to support and develop the agri-food sector is welcomed. We support the concept of a Norfolk food and farming hub set out in policy 5. The emerging proposals at Honingham Thorpe Farm for such a hub will serve the needs of the Norfolk economy and act as an exemplar for other rural economies. The Regional Economic Strategy seeks to maintain the East of England as the UK's leader in agriculture and food sector, supported by leading research centres of excellence and knowledge exchange in fields such as bio-fuels, non-food crops and agricultural engineering. The development of the food hub will support this important regional objective. The 2006 feasibility study by Norfolk County Council into the food hub concept outlined the market need and opportunity developing such an enterprise in Norfolk in order to:- make a step change in the scale of the potential market for local producers; and- address the potential for public sector procurement by developing a more effective local supply base and logistics infrastructure. The Greater Norwich Employment Growth and Sites & Premises Study (Arup, May 2008) also recognises the importance of the food sector and the opportunities associated with the food hub concept. This study recognises the potential to broaden the scope of the Food Hub's activities beyond those identified in 2006 study, to create a food cluster, bringing R&D institutions together with food processors and education institutions. The emerging proposals at Honingham Thorpe Farm are well-placed to draw on the links with Easton College and the Institute of Food Research. The Taylor Review of Rural Economy and Affordable Housing identifies that planning has a crucial role to play in supporting rural economic development, but that it is currently hampering growth. It states that removing planning blockages "can increase the availability of premises, help new firms to start and many others to grow. This in turn will help to raise productivity across all rural communities, benefiting those that live and work in them and improving the overall contribution they make to regional and national economies." As the Taylor Report identifies strong and rural economies are essential to the maintenance of attractive and diverse landscapes and natural environments - contributing to the environmental stewardship of the countryside. We welcome the JCS' positive support for delivering economic growth of the rural area. The Taylor Report recognises the important role that rural business hubs can play and recommends that such hubs should be supported and that a programme of exemplars be developed (recommendation 29). In its response the Government has accepted this recommendation. The emerging proposals at Honingham Thorpe Farms have the potential to fulfil this role as an exemplar of rural economic development. The Norfolk Food Hub represents a strategic employment opportunity. The initiative is supported by national, regional and local policy and has potential to provide more than local benefits and perform a strategic function in relation to food industries, become a model for other rural areas in terms of supporting rural employment, providing access to local healthy produce, reducing food miles, developing a local/regional brand and developing relationships with education/research institutions. The proposals fit well with national and regional aspirations:- It has the potential as a flagship opportunity and to become a model for other rural areas in terms of supporting rural employments, providing access to local healthy produce, reducing food miles, developing a local/regional brand, developing relationships with education/research institutions;- it supports the policies of the RSS and RES;- the links with research and academic institutions will help support and further develop the knowledge economy;- it would build on the Region's existing clusters of knowledge based activity;- it involves development in a market of significance for the Region, helping the agricultural industry adapt and responding to key issues such as local sourcing and reducing food miles;- it develops a local asset in which the Region has a competitive advantage;- it offers a number of synergies with environmental industries/products, for example, bio-fuels or eco-friendly building materials

Joint Core Strategy Proposed submission Document

O - 11191 - 6883 - Policy 6: Access and transportation - i

11191 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "Policy 6: Access and transportation" - support for NDR and Norwich Airport directly contradict Spatial planning objective 1 "To minimise the contributors to climate change and address its impact".

Summary: "Policy 6: Access and transportation" - support for NDR and Norwich Airport directly contradict Spatial planning objective 1 "To minimise the contributors to climate change and address its impact".

Joint Core Strategy Proposed submission Document

O - 11192 - 6883 - Policy 6: Access and transportation - i

11192 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "5.44 Implementation of the Norwich Area Transportation Strategy (NATS) including the Northern Distributor Road (NDR) is fundamental to the delivery of this strategy. Significant improvement to public transport, walking and cycling in Norwich can only be achieved with the road capacity released by the NDR..." Delivery of NDR is NOT fundamental to the delivery of improvements to public transport, walking and cycling in Norwich. Building the NDR will not release road capacity except possibly in the short term (up to 5 years). The NDR is a red herring and will result in less being spent on other forms of transport.

Summary: "5.44 Implementation of the Norwich Area Transportation Strategy (NATS) including the Northern Distributor Road (NDR) is fundamental to the delivery of this strategy. Significant improvement to public transport, walking and cycling in Norwich can only be achieved with the road capacity released by the NDR..." Delivery of NDR is NOT fundamental to the delivery of improvements to public transport, walking and cycling in Norwich. Building the NDR will not release road capacity except possibly in the short term (up to 5 years). The NDR is a red herring and will result in less being spent on other forms of transport.

Joint Core Strategy Proposed submission Document

O - 11193 - 6883 - Policy 6: Access and transportation - i

11193 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: 5.47 - support for "improvements to Norwich International Airport to expand business opportunities..." Support for Norwich Airport is incompatible with policies to address climate change. Norwich Airport actually takes people away from Norfolk to spend money elsewhere and is thus detrimental to the local economy.

Summary: 5.47 - support for "improvements to Norwich International Airport to expand business opportunities..." Support for Norwich Airport is incompatible with policies to address climate change. Norwich Airport actually takes people away from Norfolk to spend money elsewhere and is thus detrimental to the local economy.

Joint Core Strategy Proposed submission Document

S - 11284 - 2373 - Policy 6: Access and transportation - None

11284 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Persimmon Homes (Anglia) [2373]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

This policy concerns access and transportation and sets out how the transport system will be improved in the Norwich Policy Area. Part of it includes the Northern Distributor Road and also included on the list is the A140 Long Stratton Bypass. We would support the overall aim of this policy in terms of a transport strategy. However, we would express concern at the statement in the supporting text at paragraph 5.46 that the bypass will be funded mainly by housing and commercial development. It is important that the provision of housing is not delayed by viability issues concerning the provision of the bypass.

Joint Core Strategy Proposed submission Document

11314 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Mobile Operators Association [3041]

Agent: Mono Consultants Ltd (Mrs Carolyn Wilson) [7076]

Full Text:

Summary:

We have looked over the consultation document and have no specific comments on the spatial element. However we note that the document includes little reference to telecommunications infrastructure provision. Mobile telephony is playing an important and increasing role in the modern economy and is allowing people to make choices about movement and travel which can benefit the economy and allow the Councils to achieve targets in other areas with regards emissions etc. We consider that it should be included within the Core Document to highlight its importance to the delivery of the sustainable agenda and its increasing importance in all our lives. This should point to a more detailed development control policy as set out below. We consider it important that there should be a place for a telecommunications policy within the emerging Local Development Framework. It is recognised that telecommunications plays a vital role in both the economic and social fabric of communities. National guidance recognises this through PPG8, which provides clear guidance as to the main issues surrounding telecommunications development. These include the legislative framework, siting and design issues, levels of consultation and issues surrounding electromagnetic fields (EMFs). Clear guidance is also given regarding what should be included within local plan (now LDD) policy. This guidance states that local plans (LDDs) should set out criteria based policies to guide telecommunications development and that whilst regard should be had to siting and design considerations, operational efficiency should not be inhibited. PPG8 also makes clear that "Criteria should be flexible enough to allow for the efficient development of the network and the demands imposed by the technology". Since the revision of PPG8 in 2001, the Office of the Deputy Prime Minister (ODPM) has produced, in conjunction with the industry, a Code of Best Practice. This builds on the Ten Commitments to ensure that the industry is alive to the concerns of local communities and consultation is built into the development process. As indicated above the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being PPG8. On this basis we would suggest that within the Local Development Framework there should be a concise and flexible telecommunications policy contained within one of the Council's statutory Local Development Document. We recognise that this is likely to be contained in a Development Control/Management DPD rather than the Core Strategy which is of a strategic nature. Such a policy should give all stakeholders a clear indication of the issues which development will be assessed against. We would suggest a policy which reads: Proposals for telecommunications development will be permitted provided that the following criteria are met: -(i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area; (ii) if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building; (iii) if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority. (iv) If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest. When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology. It will of course depend on your Local Development Scheme as to which documents are produced, which documents have a statutory role in development control and which would be considered as material considerations. We would suggest that this policy be a stand alone policy within one of the main LDDs, with any back ground information, such as electromagnetic fields (EMFs) and public health, being contained within a separate LDD or what is currently termed Supplementary Planning Guidance (SPG). This could then be read with PPG8, the Code of Best Practice to give a comprehensive background to any proposed development. We would consider it appropriate to introduce the policy and we would suggest the following: Modern telecommunications systems have grown rapidly in recent years with more than two thirds of the population now owning a mobile phone. Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With new services such as the advanced third generation (3G) services, demand for new telecommunications infrastructure is continuing to grow. The Council are keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and location on existing tall structures and buildings. Further information on telecommunications can be found in Local Development Document..... In summary, we are suggesting that a clear and flexible telecommunications policy be introduced in one of the main LDDs. This should be introduced by a short paragraph outlining the development pressures and the Councils policy aims. We have suggested text for both above. In keeping with the aims and objectives of the new legislation any background information should be contained within a separate LDD which would not need to go through the same consultation process.

Joint Core Strategy Proposed submission Document

O - 11323 - 6826 - Policy 6: Access and transportation - i, ii

11323 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

Reason. Legally compliantThe policy will not achieve the requirement of the RSS, which seeks to 'achieve a major shift in emphasis across the NPA towards travel by public transport, cycling and walking'. It would also be contrary to the binding UK target to cut emissions, as set out in the Climate Change Act 2008, by 26% on 1990 levels by 2020 or to the PPS 1 Supplement, Planning and Climate Change.Reason. Unsound: not justifiedThe lynchpin of the Norwich Area Transport Strategy (NATS) is the Northern Distributor Route (NDR). The NDR shapes the whole JCS as regards spatial strategy and the locations and levels of housing. This was further magnified with the addition of the 'growth triangle', which was proposed earlier this year in the Regulation 25 consultation.No attempt has been made to evaluate and develop a public transport led system for access within the Norwich Policy Area (NPA) between the city centre, major existing and expanding settlements, and the strategic sites of employment. As it now stands, we have proposals for an investment-heavy roads infrastructure programme which will lead, by some years, a relatively modest investment programme in Bus Rapid Transit and rail.In our view, the large scale development in the north east sector does not meet with spatial requirements but is proposed as a means of seeking to establish the need for the road.Reason. Unsound: not effectiveAn NDR would have a number of adverse impacts. It would reinforce car dependency by introducing a roads programme some years ahead of modest public transport measures. It would create orbital travel movements in linking to the A47 Southern Bypass, inducing travel to employment sites distant from the north east area. It would produce an extra 25,000 tonnes of CO2 emissions a year, and as such contribute to the estimated 33% increase in the region between 2006 and 2031 in a Business as Usual scenario.The NDR Business Case data shows that the new road would marginally increase (not decrease as claimed) traffic across Norwich; and increase traffic by a substantial amount on the radial roads running through the north east sector. Road infrastructure costs are high; £110m for the NDR; £25m for the Postwick Hub, an integral part of the NDR; £60m for two junction improvements on the A47 bypass; and £35m for a Long Stratton bypass.Contrary to the benefits claimed for the road, it will not remove traffic from the northern suburbs and surrounding villages linked to the growth triangle but rather increase traffic levels in these areas. It will not improve the economic prospects for north east Norfolk through improved access but rather produce a competing effect from the growth triangle which will see businesses relocate there, and residents commuting down to jobs in that area. And it will not create more space for public transport improvements but rather generate more traffic on the radial roads into Norwich by embedding car dependency in the strategy's phased delivery approach.

Joint Core Strategy Proposed submission Document

O - 11336 - 8570 - Policy 6: Access and transportation - i, ii, iii

11336 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 6 fails the Justified, Effective and National Policy soundness tests because it is not based on robust and credible evidence; does not provide sufficient evidence of infrastructure provision; and Reasons Hethersett Land Ltd suggests that it is clear that the Norwich highway network, given any significant growth in the South West sector, including Hethersett and Cringleford/Colney will need to accommodate a level of additional traffic, notwithstanding the adoption of schemes and measures embodied in NATS to effect a shift to sustainable movement solutions. The forecast increase in traffic that could be associated with even a modest level of growth in the South West sector, including Hethersett and Cringleford/Colney is likely to require a significant improvement to the highway infrastructure in the vicinity. Thickthorn The Thickthorn Interchange in particular will require some improvements to accommodate the additional traffic associated with this growth, and growth elsewhere in and around Norwich. In view of the fact that the interchange has recently been the subject of a significant improvement scheme, the potential for further improvements within the existing configuration is likely to be very limited and any meaningful capacity improvement will require a very substantial injection of capital and resources. The JCS being reliant on NATS does not make reference to highway related improvements to the south west quadrant of Norwich and does not refer specifically to the Thickthorn Interchange. In this respect it is strongly considered that the JCS needs to encompass a firm commitment to significant highway improvement at that junction, as without such an improvement, the potential to accommodate additional traffic associated with further growth in the area will be severely limited. In consideration of the above and the cost implications thereof, suitable improvements at Thickthorn are unlikely to be deliverable in the context of a 1000 home allocation at Hethersett alone, and as such any major improvement scheme could only be delivered in the context of a more substantial allocation at Hethersett as well as financial contributions from growth elsewhere in the South West sector. Indeed the strategy set out in the JCS and NATS with respect to delivering growth in the North East sector of Norwich is mindful of the requirement for significant highway improvements in the form of the NDR as in the absence of that improvement; the scope for releasing highway capacity for significant and essential public transport improvements will be limited. Indeed should the NDR not be given full financial backing then the delivery of housing to the North of Norwich may be significantly affected and as such a larger allocation at Hethersett will be required to make up any shortfall. Long Stratton Hethersett Land Ltd considers the provision of the Long Stratton bypass to be a local political aspiration. The project does not appear in any regional or local public investment programmes and is wholly reliant on private sector funding to deliver it. It is the justification for the identification of the settlement as a strategic growth location. However, the delivery of the 1800 homes and therefore the bypass is called into question because of the capacity of infrastructure in the area and the viability for capacity of certain areas including sewage works to be significantly increased in the short term, beyond that possible to accommodate smaller scale 'non strategic' development. Evidence Additionally, it is considered that the justification for the JCS is based on a range of evidence that is conflicting and sometimes contrary. In the first instance the A47 junction study is based on 8,000 units in the south west sector which indicates that a significant development at Hethersett is deliverable in the context of achievable highway improvements, however, the public transport study evidence was based on 4,400 units in south west Norwich and as such demonstrated a shortfall in the requirement to provide sufficient numbers for justified investment in Bus Rapid Transport for the Hethersett corridor. This constitutes a failure against the Justified soundness test. It is clear that in order to support the likely infrastructure requirements a more significant allocation for south west Norwich and in particular Hethersett, will be required and furthermore that the evidence behind the JCS does not provide suitable justification for the strategy being adopted in Policy 6. What the JCS proposes is therefore not the most appropriate strategy in transport terms and also constitutes a failure against the Justified soundness test.

Joint Core Strategy Proposed submission Document

O - 11371 - 8627 - Policy 6: Access and transportation - ii

11371 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: We support emphasis on transportation but are concerned about the over reliance on new road infrastructure, which is contrary to spatial objectives. Objection 2: Failure to deliver a BRT at Wymondham through lack of growth. We support the priority given to transportation in Policy 6 but have some concerns with the dominance of and reliance on new roads and highway infrastructure within the Policy. Policy 6 seeks to reinforce the step change towards sustainable forms of transport provided for in Policy NR1 of the RSS, however, there appears to be a large degree of reliance on the building of new road infrastructure, i.e. the Long Stratton bypass and the Northern Distributor Road (NDR), mainly as a catalyst for new development. This will affect the JCSPS's ability to achieve, inter alia, Objective 1. Given the decision not to support the officers recommended option of 4000 new homes at Wymondham under the JCSPS and its reduction to 2200 it is unclear how good sustainable transport links will be provided. As the analysis commissioned by the GNDP in the Greater Norwich Joint Core Strategy - Public Transport Requirements of Growth (Nov 2008) (GNPT) itself lays out, with respect to securing a high frequency BRT service to Norwich a higher threshold of homes is required in Wymondham, in the region of 5,000 to 6,000 new homes. This is a further indication in terms of the extant evidence base for a higher homes allocation to Wymondham. See attached statement

Joint Core Strategy Proposed submission Document

O - 11402 - 7172 - Policy 6: Access and transportation - None

11402 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: **Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172]** Agent: **N/A**

Full Text:

Summary: Sustainability Appraisal Not compliant. Although the SA highlights that major growth located close to a NDR could result in environmental impacts such as car-based trips, the SA does not consider alternative transport options which would avoid or reduce adverse impacts as required by the SEA Directive. The SA has treated the unsustainable NDR as part of the baseline case and not as an option. Responding to public criticism on this traffic-generating impact of the NDR, the SA Report asserts: "The NDR may encourage car-based trips", but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of the road by residents of the Growth Area. However, the NDR Major Scheme Business Case (July 2008) shows high traffic growth on a number of road links across the Norwich Area as a result of the NDR Preferred Option, with substantial growth on radial roads in north-east Norwich and an increase in carbon dioxide emissions compared to Do-Minimum. Norfolk County Council has programmed construction of the NDR in 2014-15, whilst sustainable transport measures, including a bus rapid transit system, are not programmed for completion until 2025. There is a strong danger that people will get into the habit of using their cars if a NDR goes ahead. Local experience has shown the difficulty of transferring orbital car-based journeys to sustainable modes.

Joint Core Strategy Proposed submission Document

O - 11412 - 7172 - Policy 6: Access and transportation - None

11412 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary:

Not legally compliant with RSS Norwich Policy NR1 which seeks to: 'achieve a major shift in emphasis across the Norwich Policy Area towards travel by public transport, cycling and walking.' Policy NR1 must also be read alongside wider RSS policies to reduce the region's impact on climate change by locating development so as to reduce the need to travel and effect a major shift in travel away from car use towards public transport, walking and cycling. The GNDP claims that a NDR is in conformity with the RSS because RSS Policy Norwich NR1 refers to 'having regard to the Norwich Area Transportation Study (NATS), which provides a strategy for improving access by all modes of transport across the Norwich Policy Area' and NDR is a key element of NATS. At the time of the RSS EiP in 2005, the NDR project in the Draft East of England Plan was a full orbital route to the north of Norwich, approved as part of NATS in 2005. Norfolk County Council dropped the western section over the River Wensum SSSI/SAC shortly before the EiP and the NDR became a three-quarters road. Depending on the outcome of the Minister's decision on Programme Entry, the NDR could be further reduced in length. The Eastern Daily Press on 11 December 2009 reported that DfT civil servants are recommending Programme Entry for a NDR between A47 Postwick Interchange and A140, but not west of the A140. If accepted, a half route NDR would largely function as a development road for north-east Norwich and not as a full or three-quarters distributor road for north Norwich. Also, the NATS would no longer be predicated on a NDR. In such circumstances, a NDR would not be in conformity with the RSS Policy NR1 as the purpose of the NDR/NATS approved by Norfolk County Council in 2005 would have changed considerably.

Joint Core Strategy Proposed submission Document

O - 11430 - 7172 - Policy 6: Access and transportation - i, ii, iii

11430 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: **Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172]** Agent: **N/A**

Full Text:

Summary:

The GNDP has not assessed alternative options to upgrading strategic road links and building major new roads and has not demonstrated that the selected option is the most appropriate and affordable strategy. In relation to A11 and A47 improvements, the GNDP is a strong advocate of duelling and junction upgrades even though schemes to date have resulted in increased traffic flows on the A11 and A47 and additional CO2 emissions, whilst the A47 Acle Straight dualling would adversely impact on the Broads national park and habitats of national and international importance, contrary to national, regional and local policies. NNTAG strongly opposes a NDR on traffic and environmental grounds including climate change and on overall sustainability. We are highly critical of the JCS failure to test alternative transport strategies to a NDR-led NATS and to treat NDR as a fixed transport element, especially since the NDR Major Scheme Businesses Case predicts that the NATS plan with NDR does not deliver major mode switch. NDR/NATS has not previously been tested through the development plan process as part of an integrated transport and land use planning strategy. The A47 Postwick Hub, the first stage of a NNDR, is being progressed as a separate development led scheme in the guise of access for the third phase of Broadland Business Park (Broadland Gate); both projects were advertised as major departures from the Broadland Local Plan (Replacement) 2006. In so doing, the scope for examining a NDR scheme within a wider transport and land use planning context has been reduced. The justification for the detailed A47 Postwick Hub road proposals will need to be examined through the process for approving the Highways Act Orders now published by the Highways Agency. There can be no certainty that orders will be confirmed since the Postwick Hub design involves drivers having to travel a circuitous route through a series of link roads and junctions, which would result in longer journey distances and additional CO2 emissions. Policy 6 gives the impression that improvements to bus, walking and cycling networks and rail services and bus rapid transit carry equal weight to a NDR. In reality this is not the case since there are no firm proposals and no agreed funding for bus rapid transit and other sustainable measures and according to Norfolk County Council's consultation booklet 'Transport for Norwich' (October 2009), such a programme of measures is not timetabled for completion until 2025. In contrast, construction of a NDR is programmed for 2014-15. The JCS claim that a NDR is intended to release road capacity for sustainable transport is not borne out by traffic figures in the MSBC showing substantial traffic growth on roads in north-east Norwich close to a NDR and high growth on a large number of links across the Norwich area. There is a high risk in building a NDR before sustainable transport measures are in place that people will get into the habit of using their cars leading to the establishment of unsustainable travel patterns. A NDR would also lead to further road building and to a demand for more funding to pay for it, further undermining the delivery of sustainable transport. The JCS policy for A47 improvements encompasses the GNDP proposals for upgrading junctions on the A47 Norwich Southern Bypass at Easton and Thickthorn at an estimated cost of £60m as outlined in the GNDP report 'A47 Southern Bypass Junctions: Capacity Assessment Report' (Nov. 2008). The junction improvements are not a proposal of the RSS and are not explicitly referred to in JCS Policy 6. Upgrading of the junctions is designed partly to accommodate additional NNDR traffic. The Highways Agency has expressed no interest in paying for the improvements. NDR is Not Consistent with National Policy: * PPG13 ('reduce the need to travel, especially by car') - a NDR would increase the need to travel by car, for example, encourage orbital journeys in conjunction with the A47 Norwich Southern Bypass between strategic housing proposed in north-east Norwich and strategic growth employment areas at Thorpe St Andrew and to the south-west of the city. * PPS1 Delivering Sustainable Development ('ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change through policies which reduce emissions') - NDR Major Scheme Business Case (MSBC) figures show that a NNDR would increase CO2 emissions relative to the Do-Minimum scenario, by 6% in 2012 and 8% in 2027. - Postwick Hub, the first stage of a NDR would force vehicles for some journeys to travel a more circuitous route, thereby increasing mileage, fuel use and CO2 emissions. * PPS Planning and Climate Change Supplement to PPS1 ('deliver patterns of urban growth and sustainable rural development that help secure the fullest possible use of sustainable transport for moving freight, public transport, walking and cycling and which overall reduce the need to travel, especially by car') - a NDR would encourage car use e.g. the NDR MSBC Forecasting Report shows over 90% of commuting by car to new development associated with the NDR. - Traffic model shows NDR traffic clogging up radial routes in north-east Norwich, contrary to JCS claims that a NDR would free up road space for sustainable modes. NNTAG is also critical of JCS Policy 6 because it does not contain measures for managing travel demand. There are a number of measures related to a land use planning strategy which could be employed to manage travel demand. They include parking controls (such as workplace parking plans), workplace travel plans, road space reallocation measures such as bus lanes and a range of smart measures for influencing travel behaviour. NNTAG oppose the development of Long Stratton Bypass in conjunction with major housing growth. A more sustainable option is the construction of a lower cost single carriageway bypass without housing infill.

Joint Core Strategy Proposed submission Document

O - 11490 - 8057 - Policy 6: Access and transportation - ii

11490 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Re Policy 6 Access and Transportation OMISSIONThe highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11491 - 8057 - Policy 6: Access and transportation - ii

11491 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Re Policy 6 Para 5.45 The highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road. The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11492 - 8057 - Policy 6: Access and transportation - ii

11492 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Policy 6 Para 5.46The highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11493 - 8057 - Policy 6: Access and transportation - ii

11493 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Policy 6 Para 5.47The highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11498 - 8057 - Policy 6: Access and transportation - ii

11498 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

Policy 6 Para 5.48The highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

S - 11527 - 8300 - Policy 6: Access and transportation - None

11527 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Phillip Jeans Homes Ltd [8300]

Agent: Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text:

Summary:

Policy 6 Access to Transportation states that 'The transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of the Norwich ASrea Transportation Strategy, and will improve access to rural areas'. Phillip Jeans wholly support this strategy and consider that development on their site at Georges Lane, Loddon would be wholly sustainable being in close proximity to existing public transport provision and within easy walking distance to a number of key services and facilities.

Joint Core Strategy Proposed submission Document

S - 11528 - 8591 - Policy 6: Access and transportation - None

11528 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

The PSD rightly seeks to ensure that the transportation system will be enhanced to support the strategic role of Norwich and improve access to the rural areas. We endorse one of the elements of this approach, namely the "provision of an A140 Long Stratton Bypass." We endorse the comment at paragraph 5.45. Enhanced strategic access to jobs, services and facilities across the area are also key to the success of this JCS." Enhanced strategic access will reduce the perceived isolation of Norfolk. Improvements to the transportation network will help stimulate and enhance the local economy and make the area more attractive for inward investment. The construction of a bypass to the east of Long Stratton will play a significant and important part in achieving this policy objective. We endorse paragraph 5.46 which identifies strategic improvements that are required to deliver growth and facilitate modal shift. We concur with the observation that the A140 Long Stratton Bypass will be funded mainly by housing and commercial development." A bypass at Long Stratton will deliver many environmental/community benefits and its provision rightly forms part of the JCS spatial policy framework. It is unlikely that sufficient public funding will be available to ensure the construction of the bypass and, for that reason, the JCS correctly acknowledges that it will be funded mainly by new development associated with the expansion of Long Stratton described at policies 9 and 10 of the JCS.

Joint Core Strategy Proposed submission Document

O - 11540 - 8597 - Policy 6: Access and transportation - i, ii, iii

11540 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living contends that Policy 6 fails the Justified, Effective and National Policy soundness test because in the supporting text (para 5.44) reference is made to 'implementaion of the Norwich Area Transportation Strategy (NATS) including the Northern Distributor Road (NDR) is fundamental to the delivery of this strategy'. Blue Living, whilst acknowledging that teh NDR will assist in delivering growth, consider that a phased development of growth can occur without its provision. Blue Living consider that the JCS cannot be wholly dependent on the construction of the NDR and that intrnal road networks within NE Norwich quadrant, with associated enhanced public transport features will assist in bringing forward a sustainable form of growth. Blue Living in it submission to the NATS consultation identified that, whilst welcoming the NDR as part of the emerging transport Stratgey, the implementaion of the scheme is not considered to be essential in the delivery of growth in NE Norwich. A significant element of development can be implemented in the absence of the NDR as the proposed complementary transport measures including bus priority, cycle infrastructure, aprk & ride improvements and general highway capacity enhancements are not reliant on the NDR and will enable the additional movement demand to be accommodated via sustainable means.

Joint Core Strategy Proposed submission Document

S - 11555 - 8603 - Policy 6: Access and transportation - None

11555 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: BLanmar 1 LLP [8603]

Agent: Woods Hardwick Planning (Mr Tim Collie) [7449]

Full Text:

Summary: This policy deals with the transport system and the implementation of Norwich Transportation Strategy. We would support this ploicy as it is key to the delivery of the Housing and employment delivery targets

Joint Core Strategy Proposed submission Document

S - 11559 - 1998 - Policy 6: Access and transportation - None

11559 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Easton Parish Council (Mr J H Witcombe) [1998] **Agent:** N/A

Full Text:

Summary: We would want to be involved in every aspect of development in and affecting Easton e.g. There is a question of whether the Bus Rapid Transit route to the City Centre via Dereham Road should include Easton. We have been campaigning for years for a pedestrian/cycle link from Easton to Longwater. Links to Longwater are said to be in the plan but they do not include Easton?

Joint Core Strategy Proposed submission Document

O - 11570 - 8018 - Policy 6: Access and transportation - i

11570 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary:

We believe the above soundness of the above Development Plan Document can be challenged on the following grounds:1. There is a lack of evidence to demonstrate that:i) the Northern Distributor Road (NDR) is a cost effective and well-located option to serve planned growth areasii) the NDR fulfils the Document's Objectives on Sustainability, Climate Change and Use of Natural Resources1a The NDR is a road designed to distribute traffic and goods across the north of the city - feeding in to one major housing development (Rackheath triangle area) and 3 strategic employment areas - the airport, Rackheath Triangle and Broadland Business Parks.1b The major housing areas can feed into these without the need for a dual carriageway, and people commuting from within the city are more likely to benefit from improved public transport links directly from the city centre and an orbital bus route. The Broadland Local Plan (Replacement) (2006) envisaged a more low-cost option of a single carriageway service road to link the Rackheath area with the Postwick hub and there is a lack of evidence to suggest why a dual carriageway, with its associated problems of permeability, would instead be a preferred solution. (The NDR is also not shown as a policy in the East of England Plan 2008).1c The rest of the housing growth is in the south and south-west of the city 'The NDR only affects the North parts of the outer Ring road on terms of vehicle time and delay' which will render it ineffective for most of the major housing growth in the area - which will depend on well linked infrastructure and public transport. The objectives of the East of England Plan are to - locate developments so as to reduce the need to travel, effecting a major shift in travel away from car use towards public transport, walking and cycling. The linking of the planned developments mentioned above with a dual carriageway does nothing to achieve these goals.1d The key diagram on page 29 of the proposed document illustrates well how poorly the NDR relates to new development, with most of its length from Rackheath to the Fakenham Road being only relevant to one growth employment area at the airport which has a planned expansion of 30 hectares (out of a total 175 hectares planned employment area expansion outside the city centre). The western end of the NDR does not link with any growth area.1e Sustainability objectives are firmly embedded in much of the wording of the strategy. Under the heading 'The Grand Challenges' on page 6, the strategy states an aim to make a '...radical cut in carbon emissions, reducing reliance and costs of energy fuelled by carbon generating sources...' On p22 the Spatial Vision proposes that the use of global resources will be minimised and, on page 24, that there will be a reduced need for car use. Meanwhile, on page 26 Object 1 includes the aim of 'minimising contributors to climate change' and on page 27 Object 7 aims for a reduction in the need to travel, especially by private car, and the greater use of sustainable modes of transport.1f By any objective criteria, it is difficult to see how the construction of a dual-carriageway is compatible with these aspirations. The Northern Distributor Road is likely to encourage car use and increase CO2 output for the city, which will significantly hinder attempts to reduce emissions in line with national carbon budgets and the strategy's objectives. Indeed, the Major Scheme Business Case for the NDR envisaged a 57% increase in traffic emissions by 2071 and it has the 4th highest emissions of any local road scheme in England. The Business Case also envisaged 90% of commuters to new developments would use the car which directly contravenes the modal shift away from car use envisaged in PPG13.1g Similarly, the argument in 5.44 that 'significant improvement to public transport, walking and cycling in Norwich can only be achieved with the road capacity released by the NDR' is a highly unusual one, as it seems clear that to invest the money that would have been spent on the NDR directly into public transport would have a far greater impact in reducing traffic levels. More particularly, the traffic model for the NDR shows the road contributing to an increase in traffic on the Wroxham Road which would be a key arterial route servicing new development. Similarly, the first route planned for an Bus Rapid Transit Route is the Dereham Road and yet the NDR does not link to this road. Indeed, traffic is likely to increase on the Dereham Road, along with the Fakenham Road and Sweet Briar Road, from NDR related traffic crossing the Wensum valley.1h The cost of the NDR, together with the Postwick hub and 2 other related A47 interchanges, would on current estimates run to £190 million. Effectively, this would use up available regional transport funding for years. Meanwhile, completed delivery of sustainable transport measures in the Norwich area is not envisaged until 2025 with much of the details, dates of delivery and sources of funding still to be identified. This would mean that the road is far more likely to entrench car dependency and cause car-reliant patterns of development long before the effects of public transport improvements are felt. 1i Therefore, to disprove the argument that the construction of the NDR is not in contravention with sustainability objectives, an evidence base with thorough modelling of non-NDR alternative solutions would be necessary. Yet all the way through the process, the NDR has been treated by the GNPD as an assumption and the modelling of non-NDR alternatives has been reluctant and incomplete. The Department of Transport itself revealed its frustration with this approach in a letter, dated 15 September 2009, from John Dowie, Director, Regional & Local Transport Delivery, to Mike Jackson, Director of Environment, Transport and Development at Norfolk County Council. The letter states:'Finally, before we would be in a position to consider Programme Entry there are two additional pieces of work which also need to be concluded:* My colleagues would like to discuss with your team further details of non-road alternatives that you have investigated before arriving at the preferred scheme. I know this has been raised on a number of occasions previously but we will require a fuller statement of the analysis you have undertaken than what currently appears within the Business Case. '1j Within the Core strategy, spatial planning objectives 8 and 9 concern access to the countryside and maintaining and enhancing biodiversity and the unique qualities of the area. Yet the impermeable nature of a dual carriageway would be a significant hindrance to countryside access and the road would create distinctly unattractive 'gateways' to the city (5.10 on page 37 states that the 'urban edge is particularly sensitive'). Large parts of the area to the north-east of the city are characterised as ancient woodlands or historic parks and gardens and are protected under existing policy ENV10. The proposed NDR directly borders one such area (to the West of Rackheath) and goes straight through another (Beeston

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Joint Core Strategy Proposed submission Document

O - 11570 - 8018 - Policy 6: Access and transportation - i

11570 Object

CHAPTER 5 Policy 6: Access and transportation

Park). All of this begs the question of just how protected these areas are. Policy 1 in the strategy also speaks of preserving the resilience of eco-systems and minimising the fragmentation of habitats. The NDR similarly seems to be in complete contravention of that aim

Joint Core Strategy Proposed submission Document

O - 11574 - 8018 - Policy 6: Access and transportation - i

11574 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Norwich Green Party (Mr Stephen Little) [8018] **Agent:** N/A

Full Text:

Summary: In 5.46, improvements required to 'facilitate modal shift' are all road schemes!

Joint Core Strategy Proposed submission Document

S - 11608 - 8607 - Policy 6: Access and transportation - None

11608 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that the limitation of 300 dwellings only at Aylsham is founded on nothing but a cursory consideration of an arbitrary division of housing requirement figures and infrastructure capacity analysis, specifically sewage. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth in Aylsham is provided. Our client's land interest is the site at Sir Williams Lane, Aylsham which is capable of accommodating up to 500 dwellings and supporting infrastructure. By limiting the scale of growth at Aylsham to 300 dwellings the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.

Summary: Policy 6 - Access and Transportation states that "The transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of the Norwich Area Transportation Strategy, and will improve access to rural areas." 5.7 Landform wholly support this strategy and consider that development on their site would be wholly sustainable being in close proximity to existing public transport provision and within easy walking distance to a number of key services and facilities.

Joint Core Strategy Proposed submission Document

O - 11622 - 8609 - Policy 6: Access and transportation - None

11622 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: **Morton-on-the-Hill Parish Meeting (Sally Buckley)** Agent: **N/A**
[8609]

Full Text:

Summary:

...although the A1067 is a principal route, there is a long-standing problem with links to the A47. Although there are plans to improve the link, there is no mention in your plans of a link road being a priority within the next 5 years. The option of putting more traffic on the A1067 and other local roads should be very carefully considered. We feel that this is unsatisfactory that you have paid little consideration to proper planned transport links. Morton-on-the-Hill Parish favour the Honningham - Hockering link road to Lenwade and stress that this should be included as part of your strategy or the traffic through Morton-on-the-Hill / Weston Longville etc will continue to be a problem for several years to come.

Joint Core Strategy Proposed submission Document

S - 11637 - 7523 - Policy 6: Access and transportation - None

11637 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: Regional policy supports proposals for the Norwich Northern Distributor Road (NNDR). The East of England Plan Panel Report (published in June 2006) stated that development of the NNDR is 'essential to improve the quality of life in residential areas, aid rural regeneration ... and facilitate urban expansion'. Urban growth policies of the JCS are consistent with this approach. Development of the NNDR is currently scheduled for pre 2013/14. Improvements to the A11 and A47 are under consideration. Provision of a bypass on the A140 at Long Stratton is not currently included in regional transport objectives.

Joint Core Strategy Proposed submission Document

O - 11655 - 8366 - Policy 6: Access and transportation - i, ii

11655 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. In representations made to the regulation 25 consultation the BLT suggested that policy 6 (previously policy 16) be amended to include bullet points that refer to new rail halts that utilise the capacity of the Bittern Line and to an inner link road in the area being promoted by the BLT, which has been safeguarded in two parts. Our justification for suggesting these amendments are contained in previous objections. It is noted that the supporting text to the policy (paragraph 5.47 bullet six) refers to improvements to services on the Bittern Line (including new stations at Rackheath and Broadland Business Park) and the investigation of tram train services are supported strategic improvements to aid delivery and economic success. The inclusion of this text is in part supported by the BLT. It is considered the potential for rail to stimulate growth in the Greater Norwich Area and achieve a much greater modal shift has been drastically underplayed in the JCS. For example, although policy 6 mentions promoting the enhancement of rail services, including links to London and Cambridge, it does not convey how significant this is in the context of a growth strategy for Norwich. Along the Cambridge line growth is planned at Wymondham and Thetford. The strategy in the JCS should seek with developers and landowners to develop the potential for rail improvements with the operators. Equally there is no mention of any aspiration or intention to negotiate with rail operators involved in the East Coast Franchise to look for a reduction in journey times to London (in line with the pre-privatisation service). The GNDP have not provided any response to previous representations and therefore have not justified why they have not included reference to the designated inner link road suggested by the BLT. As highlighted in previous representations, the provision of an inner link road within the sustainable urban extension promoted by the BLT would enable the delivery of the urban extension in advance of the Northern Distributor Road. The BLT are concerned that the omission of any reference to the inner link road threatens the soundness of the Core Strategy as it can be argued that the GNDP have not considered the most appropriate strategy and as such, potentially limit deliverability and flexibility of the document. It is therefore considered that the inner link road is referenced in policy 6. As stated previously, as part of the wider transportation strategy, emphasis should be placed explicitly on the need to move towards land use planning to discourage excess movement to support daily needs, and to encourage a shift towards more sustainable modes with an overt recognition of the nexus of transportation policy and land use policy to achieve this objective.

Joint Core Strategy Proposed submission Document

O - 11664 - 8511 - Policy 6: Access and transportation - i, ii, iii

11664 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

We object to the implication in paragraph 5.46 that the Long Stratton bypass would facilitate a modal shift. This is in direct contradiction to the findings of the Sustainability Appraisal, which noted: 'However, one of the major growth locations - Long Stratton - does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA.' (SA, page VIII) The proposed Long Stratton bypass would make the A140 more attractive to motorists due to improved journey times, with the likely result that traffic would increase as it was used for less essential journeys. Long Stratton also lacks suitable public transport connections, and so the many new residents (estimated in the Infrastructure Topic Paper to be 3,817 people) would simply add to this increase in car traffic, as they travelled to higher order settlements (particularly Norwich) for employment and key services. A further concern with regard to locating development in Long Stratton is that it is currently relatively isolated from many sources of employment, and the proposals in the Core Strategy will not remedy this situation. While the Core Strategy has considered the larger settlements, such as the Main Towns, to be suitable locations for strategic employment growth, Long Stratton is referred to as a village, and has clearly not been considered either sufficiently well connected or of a sufficient scale to include such an allocation. Any new development in Long Stratton will continue to be isolated from sources of employment, therefore generating unsustainable commuting patterns.

Joint Core Strategy Proposed submission Document

O - 11670 - 8511 - Policy 6: Access and transportation - i, ii, iii

11670 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

Long Stratton Bypass We object to the inclusion within Policy 6 of the proposed Long Stratton bypass. Whilst the Sustainability Appraisal notes that the Long Stratton bypass would bring local benefits in terms of improvements in air quality, when viewed in the context of the Core Strategy as a whole, it is clear that it is not the most appropriate use of limited resources. Page 9 of the Core Strategy refers to the balance which the document has sought between 'technical evidence against the preferences of local communities', noting that the Long Stratton bypass has been proposed on the basis of the latter of these two issues. While the comments of the Parish Council appear to contradict this assertion, the Sustainability Appraisal is explicit in pointing out that the proposed bypass is not supported by the technical evidence either: 'However, one of the major growth locations - Long Stratton - does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA.' (SA, page VIII) Objective 7 of the Core Strategy aims to reduce the need to travel, particularly by private car, through the location and design of new development. It also aims to provide sustainable modes of transport as an alternative to private cars. These aims are consistent with the guidance set out in national planning policy documents such as PPS1, which seeks to direct development to locations which will 'reduce the need to travel' (PPS1, para 23, point vii). Key Principle (ii) of PPS1 suggests reducing carbon emissions through 'encouraging patterns of development which reduce the need to travel by private car' (PPS12, para 13, point ii). The proposed Long Stratton bypass would be contrary to these aims. It would make the route more attractive to motorists due to improved journey times, with the likely result that traffic would increase as it was used for less essential journeys. Long Stratton also lacks suitable public transport connections, and so the many new residents (estimated in the Infrastructure Topic Paper to be 3,817 people) would simply add to this increase in car traffic, as they travelled to higher order settlements (particularly Norwich) for employment and key services. The Core Strategy notes that much of the existing transport network is currently operating at 90% of its capacity. However, it does not appear to consider the direct effect which the proposals for Long Stratton will have in increasing traffic on the roads in and around Norwich, and how this will relate to its other proposals. A further concern with regard to locating development in Long Stratton is that it is currently relatively isolated from many sources of employment, and the proposals in the Core Strategy will not remedy this situation. While the Core Strategy has considered the larger settlements, such as the Main Towns, to be suitable locations for strategic employment growth, Long Stratton is referred to as a village, and has clearly not been considered either sufficiently well connected or of a sufficient scale to include such an allocation. Any new development in Long Stratton will continue to be isolated from sources of employment, therefore generating unsustainable commuting patterns. The Sustainability Appraisal supports our conclusions in its summary of the effects of Policy 9, noting: 'At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away).' (SA, page 58) This appears to echo the GNDP's conclusions at Appendix 4 of their Issues & Options consultation document: 'Long Stratton provides a range of local services and some local job opportunities. It is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time.' The SA also noted the contrast between the 'local level benefits associated with growth at Long Stratton' and the 'more strategic 'disbenefits' (SA, page VIII). Implications for the Funding and Delivery of Infrastructure The Core Strategy notes that the Long Stratton bypass is a prerequisite for development in the village. The 2008 Regulation 25 draft of the Core Strategy noted that Long Stratton could only accommodate in the order of 20 - 50 dwellings prior to the completion of the bypass. Core Strategy is not clear on where the funding for the bypass will come from, other than vague statements that the new housing is intended to pay for it. The Infrastructure Topic Paper outlines the need for a huge amount of new infrastructure across the Norwich Policy Area, in order to deliver the development proposed in the Core Strategy. The Core Strategy itself notes that 'the cost of the infrastructure required is likely to exceed the expected income from all sources' (para 7.4). The Infrastructure Topic Paper also notes that in excess of £112 million will be required to deliver the proposed development in Long Stratton (a figure which is somewhat higher than the £35 million estimated to be required to build the bypass alone). If this funding is to be drawn from a central pot, it is likely that either these or other competing infrastructure projects will be delayed or even abandoned. Alternatively, if development at Long Stratton is to be self-funding, the cost of borrowing over the (minimum) ten year period which the bypass, housing and associated development would take to build, could effectively double the overall cost of the necessary infrastructure. Given the apparent scarcity of funding for the ambitious proposals outlined in the Core Strategy, it is also unclear on what basis the proposed development in Long Stratton can be justified. The Core Strategy does not appear to promote any evidence to support of the need for development in the town, other than in order to fund a bypass. The Core Strategy does not set out the context of the high price this will require in relation to the limited local benefits it will bring. It is also unclear from the information made available by the GNDP how the apparent funding problems will be resolved, and with what certainty the Core

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Joint Core Strategy Proposed submission Document

O - 11670 - 8511 - Policy 6: Access and transportation - i, ii, iii

11670 Object

CHAPTER 5 Policy 6: Access and transportation

Strategy can claim that the proposed 1,800 home development at Long Stratton will fund the £112 million cost of the necessary infrastructure. Where Core Strategies rely on the delivery of infrastructure, PPS12 requires them to provide evidence of 'who will provide the infrastructure and when it will be provided' (PPS12, para 4.8). This should be set out in terms of: infrastructure needs and costs; phasing of development; funding sources; and responsibilities for delivery. (PPS12, para 4.9) PPS12 also notes that Core Strategies should make 'proper provision for... uncertainty and... not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning - showing how the objectives will be achieved under different scenarios - may be necessary in circumstances where provision is uncertain.' (PPS12, para 4.10). We are also concerned that the high cost of the bypass will result in a reduction in the other essential infrastructure which can be delivered in Long Stratton. In its summary of the three growth options tested, the Sustainability Appraisal suggests that the 'Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.' (SA, page 39). In contrast, the Core Strategy repeatedly implies that this will not be the case. We are therefore concerned that the Core Strategy is not only inconsistent with the recommendations made by the Sustainability Appraisal, but in fact makes statements which are contrary to its conclusions (we have addressed some of the more profound inconsistencies in separate representations). We have also noted the comments of the Chairman of South Norfolk Council's Cabinet, and Leader of the Council (from the 25 September 09 meeting which approved the Pre-Submission Core Strategy), who made the following comment in relation to a proposed summary of the Core Strategy: 'He added that the summary of the Strategy needed expanding to emphasise the stepwise nature of the proposed development and clearly link the provision of infrastructure to homes. The summary would also need to acknowledge that a large proportion of the 57,500 new homes referred to were speculative and would not be delivered by 2031.' This view, from the Leader of South Norfolk Council, casts doubt on whether the development in the Core Strategy can be delivered. We would suggest that the proposed development in Long Stratton is particularly at risk of not being delivered, and greater certainty of delivery could be achieved by locating this development in Wymondham.

Joint Core Strategy Proposed submission Document

S - 11704 - 8363 - Policy 6: Access and transportation - None

11704 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary:

Paragraph 38 of PPS3 refers to the criteria to be used by local planning authorities when identifying locations to accommodate new housing. One of the matters to be weighed in the balance is the accessibility of a proposed development area to existing local community facilities, infrastructure and services, including public transport. The location of housing should facilitate the creation of communities of sufficient size and mix to justify the development of, and sustain, community facilities, infrastructure and services. The desired outcome can be achieved by extending the existing Lodge Farm development area. We consider that the JCS should more clearly endorse the concept of a preferred direction of growth between the A47 and the existing urban edge of Norwich. Where Greenfield development is in avoidable, it should be guided to areas with good access to Norwich, to a range of strategic employment locations, and services, and where good public transport links exist or can be provided. There are substantial/important existing strategic employment locations at Longwater and Bowthorpe, close to the proposed Lodge Farm extension. The Costessey area is an appropriate location for growth given the relationship between the proposed new housing and the existing strategic employment locations. The combination of new housing and the existing development off Dereham Road provide the opportunity to achieve significant improvements to the bus, cycling and walking network required by Policy 6 of the PSD. Policy 6 also promotes the concentration of development close to essential services and facilities to encourage walking and cycling as the primary means of travel, with public transport wider access. This can be achieved in the broad area to the south of Dereham Road and to the east of the A47. We would note that the critical mass of population that could be achieved by way of the existing housing land allocations in Costessey and the provision of further housing as an extension to Lodge Farm could provide the opportunity to secure a quality public transport link along Dereham Road to Norwich City Centre. Dereham Road represents a public transport corridor into the centre of Norwich with a park and ride site in the vicinity of the junction between the A47 and Dereham Road. An extension of the existing Lodge Farm development area would make appropriate use of this existing facility and provide an opportunity to enhance its value. More bus priority can be promoted on this key radical route whilst equally recognising the need to ensure capacity is available for movement by private car. New housing to the west of the present Lodge Farm development area would not require additional significant infrastructure to support its implementation. Our suggested extension of the present Lodge Farm development would not have a material impact upon the operation of the junction between Dereham Road and the A47. Access arrangements for a potential enlargement of the Lodge Farm site could incorporate a roundabout located on Dereham Road, to the west of the existing access to the Lodge Farm buildings in order to provide sufficient and satisfactory access to the land concerned. In addition, the section of carriageway between that roundabout and the A47 junction could be constructed to dual carriageway standard, thereby providing sufficient stacking space for queuing vehicles on the approach to the grade separated junction. Furthermore if necessary, a left turn filter onto the A47 southbound could be provided within the Lodge Farm extension area. Para 4.1.1 of appendix 3 of the Topic Paper entitled "Strategy to Accommodate Major Housing Growth in the Norwich Policy Area" indicates that one of the key factors in meeting the requirements of the EEP will be achieving (a significant change in travel mode from car to public transport, walking and cycling." The Topic Paper indicates that the amount of housing proposed at Costessey is insufficient in size to deliver radical improvements to public transport. However "a Bus Rapid Transit service is already proposed for the Dereham Road corridor as part of the current Norwich Area Transport Strategy (NATS) refresh. The Public Transport Assessment of the favoured option indicates that the business case for an incremental extension of a BRT service on the Dereham Road corridor to any further development at Costessey/Easton should be considered within a holistic approach to the design of a high quality public transport network to serve this corridor." We have noted the comment in the Topic Paper regarding the A47 Longwater interchange to the effect that "although an agreed solution exists to mitigate the impacts if the currently permitted development proposed." This aspect can reasonably and appropriately be considered in the formulation of an appropriate masterplan for the suggested growth location to the south of Dereham Road and to the east of the A47.

Joint Core Strategy Proposed submission Document

O - 11717 - 8618 - Policy 6: Access and transportation - i, ii

11717 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

This policy re-emphasises the dependency placed upon construction of the NDR in order to deliver both economic and housing development at a number of the strategic growth locations, particularly to the north east of Norwich. We consider the proposed Joint Core Strategy to be fundamentally unsound as evidenced by the statement accompanying the publication of the Proposed Submission Document: "...please note that a decision on whether to proceed to submission will only be taken after consideration of representations received, and after confirmation that the Norwich Northern Distributor Road, as an integral part of the Norwich Area Transportation Strategy, has secured entry into the Regional Funding Programme, in order to give the necessary confidence in its delivery..." This statement shows that the GNDP has not considered any reasonable alternatives to the proposed preferred strategy which is entirely dependent for its delivery upon the funding of the Norwich Northern Distributor Road. Should the necessary funding not be given towards the provision of this road, it is clear that proposed strategic growth locations cannot be delivered as planned and there is no reasonable alternative in place with which to deliver the necessary growth in both housing and employment required within the Greater Norwich area within the timescales set by the East of England Plan. In this respect alone, the JCS cannot be considered to be in general conformity with that plan. In such circumstances there is no "Plan B", as acknowledged in the Soundness Self Assessment. The Policy and the DPD cannot show how improved journey times and reliability to London and Cambridge by rail can be delivered as there is commitment to this by rail service providers within the plan. Similarly, "...innovative use of the local rail network..." is not defined nor is it indicated how this is to be achieved. The proposed Long Stratton by-pass is referred to elsewhere in our representations. There is no statement on how improvements to the A11 and A47 roads will be delivered, when or by whom. The policy states that all new development must demonstrate how it contributes to the objective of obtaining fast broadband connection. This has got nothing to do with new developments and everything to do with those providing this service. If there is no commitment from any service providers to prove that this can be delivered it is difficult to see how developers of housing sites can influence this. Paragraph 5.43 states that the transport strategy will promote sustainable economic development. This is based upon further road building and is therefore based upon a road based access strategy first and foremost. We do not consider this sustainable to be able to achieve the modal shift required by the East of England Plan. Paragraph 5.46 of the JCS Submission Draft states that the NDR is recognised in the East of England Plan. This is not the case. There is no reference in the plan to this road proposal and at the time of writing it is clear that there is no government commitment towards its funding. Junction improvements required on the A47 include that at Thickthorn, the junction with the A11, yet nothing is said about what these are to consist of and whether it, or any other junction along the A47 possesses the capacity to accommodate not only normal growth in traffic but growth arising as a result of proposed development. No indication is provided as to the extent to which any commitment is or has been given to any of the transport related proposals appearing in paragraphs 5.46 and 5.47.

Joint Core Strategy Proposed submission Document

S - 11729 - 8607 - Policy 6: Access and transportation - None

11729 Support

CHAPTER 5 Policy 6: Access and transportation

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that up to 250 dwellings should be allocated at Mulbarton. Presently the settlement is earmarked for between 10 - 20 dwellings as it is classified as a Service Village under Policy 15 of the JCS. We consider this figure is founded on nothing but a simple averaging exercise rather than a considered approach to capacity. The submitted JCS does nothing to explain why the housing figures in Policy 15 have been divided in this way and no reasoned justification for the proposed level of growth within these Service Villages. We believe there should be two levels of Service Village, Minor and Major. The Minor Service Villages have extremely limited services and should not receive any growth, whilst the Major Service Villages such as Mulbarton should receive a much higher allocation. Furthermore the 1,800 dwellings to be allocated to smaller sites in South Norfolk should be taken into consideration, meaning Major Service Villages such as Mulbarton should receive in the region of 250 dwellings.

Summary: Policy 6 - Access and Transportation states that "The transportation system will be enhanced to develop the role of Norwich as a Regional Transport Node, particularly through the implementation of the Norwich Area Transportation Strategy, and will improve access to rural areas." 5.7 Landform wholly support this strategy and consider that development on their site would be wholly sustainable being in close proximity to existing public transport provision and within easy walking distance to a number of key services and facilities.

Joint Core Strategy Proposed submission Document

O - 11736 - 1813 - Policy 6: Access and transportation - None

11736 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Mr John Hurst [1813]

Agent: N/A

Full Text: THIS SUBMISSION WAS RECEIVED AFTER THE PUBLICATION STAGE ENDED

Summary: My only comment is that I believe that the current strategy is "unsound" because it does not include provision to improve the existing link road between the A47 and the A1067 up to the principal route standard. It would appear however that the Department of Transport take the same view and now that the Northern Distributor route is terminating at Norwich International Airport this will probably solve the problem!

Joint Core Strategy Proposed submission Document

O - 11737 - 3412 - Policy 6: Access and transportation - None

11737 Object

CHAPTER 5 Policy 6: Access and transportation

Respondent: Chenery Drive Residents Association (Mr R. Craggs) [3412] **Agent:** N/A

Full Text: The attached letters were received at the GNDP office on Thursday 18 March 2010. However, the respondent had thought that these comments were received and incorporated during the earlier stages of consultation for the Joint Core Strategy. The GNDP has accepted these as late submissions. Copies have been forwarded to the Planning Inspectorate to be included with the other submission documentation.

Summary: Respondent has been asked to provide individual representations

Joint Core Strategy Proposed submission Document

O - 11337 - 8570 - Policy 7: Supporting communities - i, ii, iii

11337 Object

CHAPTER 5 Policy 7: Supporting communities

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd support the general thrust of the policy but contends that Policy 7 fails the Justified, Effective and National Policy soundness tests. Hethersett Land Ltd notes that Policy 7 requires the provision of community infrastructure to support housing growth. However, the policy fails to clarify how the community infrastructure requirements will be delivered and also fails to recognise the issues surrounding viability and delivery as part of strategic growth proposals. In this regard, without public funding support the delivery of the full range of infrastructure being sought at the strategic growth locations in South Norfolk is questionable at the scale of growth being proposed.

Hethersett Land Ltd suggests that it can be demonstrated that the ability of providing such infrastructure without public subsidy is limited at the South Norfolk Strategic growth locations because the scale of development has been restricted to meet political aspirations, rather than sustainability reasons and without regard to scheme viability and delivery. In this regard, it is considered that the policy fails the Effective soundness test in that it does not embrace sound infrastructure delivery planning. Moreover, it is also appropriate that where development proposals are expected to deliver community infrastructure that the extent and nature of provision being required is based on up-to-date assessments of needs arising from the development in question and the policy should therefore reflect this requirement in accordance with guidance within circular 05/05. Additional wording is required within the policy to clarify this and thereby ensure consistency with national policy. More specifically, the policy states that Health Impact Assessments will be required for large-scale housing proposals. However, neither the policy nor any glossary clearly defines what 'large-scale' actually means and there is therefore a lack of clarity as to the interpretation of the policy and to which proposals its scope applies. Elsewhere in the document 500 homes is deemed as a trigger for certain policy requirements. In this regard, it is considered that Policy 7 fails the effective soundness test in that it does not represent the most appropriate strategy having regard to all reasonable alternatives. Secondly, it is considered that this is a particularly onerous requirement for which there is no firm policy or legislative justification. As such, it is considered that it fails the National policy test. The policy also states that new police facilities will be provided to serve areas of major growth. Again, the terminology is unclear. It is assumed that the 'areas of major growth' referred to are meant to be the identified strategic growth locations but the wording could be more clear and precise to avoid confusion as to which proposals it applies. Of greater concern, is that the principle of providing facilities in all growth locations has not been fully justified with evidence. Whilst the Infrastructure Needs and Funding Study identifies the need for new or expanded Safer Neighbourhood Teams within the strategic growth locations, it does not clarify what type of facilities are required to serve them and therefore what is being sought. As such, it is considered that it fails the Justified soundness test in that it is not clearly justified by evidence within the Infrastructure Needs and Funding Study.

Finally, the policy also refers to support for community development workers to help integration and cohesion between new and existing communities. The implication is that this could ultimately be sought through planning obligations for the growth locations. Again, there is limited justification and evidence as to why this requirement is necessary, or its affects on scheme viability. As such, it is considered that this results in another failure against the Justified soundness test in that it is not clearly justified by evidence.

Joint Core Strategy Proposed submission Document

O - 11383 - 8627 - Policy 7: Supporting communities - i, ii

11383 Object

CHAPTER 5 Policy 7: Supporting communities

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: The current JCS pattern of growth does not maximise development in the most sustainable locations and chooses some locations poorly represented with facilities and based on achieving road solutions. Objection 2: The current JCS pattern of growth is dispersed and not sufficient in scale to deliver critical new infrastructure. Policy 7 highlights the importance of access to a range of services and facilities in order to enhance the quality of life and the well being of communities. In order to maximise the utility of existing infrastructure and services and to respond to the projected poor delivery issues identified in these representations, growth should be prioritised to those locations which have good existing access to a range of social and physical infrastructure. The emphasis should then be on achieving the necessary quantum of new housing to secure further benefits for the local community. 1.43 A detailed facilities audit of the main growth locations carried out independently by Barton Willmore Planning (BWP), located in Appendix 3, indicates that Wymondham is a highly sustainable location, ranking Wymondham (South) as the second most sustainable settlement and Wymondham (North East) as the fifth most sustainable settlement out of 17 locations. 1.44 Based purely on the number and range of facilities across the different growth locations, growth should focus on a Wymondham strategic site release and a NE Norwich strategic site release. Other settlements beyond these locations, such as Hethersett, Cringleford, Long Stratton and Easton could take up to 500 dwellings each and then some of the Key Service Centres could take up to 50 dwellings each, subject to the demonstration of a sound facility base to support such development. 1.45 Directing higher levels of housing growth to fewer settlements with good access to existing infrastructure brings many benefits, in terms of securing new social and physical infrastructure.

1.46 In the case of Wymondham, Wymondham High School is currently at capacity and there is therefore a need for a new secondary school. Analysis located in Appendix 4 demonstrates that a higher threshold of new housing (to the order of circa 6,000 new homes) is required in order to make a new secondary school viable. Similarly, a higher allocation of housing would make a high frequency BRT service viable, with the findings of the GNPT indicating that growth of 5,000 to 6,500 new homes is necessary to secure such as service.

Joint Core Strategy Proposed submission Document

S - 11391 - 8595 - Policy 7: Supporting communities - None

11391 Support

CHAPTER 5 Policy 7: Supporting communities

Respondent: Mr Charles Birch (Trustees of the Gurloque Settlement, et al) [8595]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We concur with the observation in Policy 7 that all development will be expected to maintain or enhance the quality of life and the well-being of communities and protect/strengthen community cohesion. We endorse the approach which seeks integration and cohesion within and between new and existing communities. Part of that outcome will be achieved through a comprehensive and co-ordinated approach to the master planning of the growth area anticipated at Cringleford.

Joint Core Strategy Proposed submission Document

O - 11521 - 7653 - Policy 7: Supporting communities - iii

11521 Object

CHAPTER 5 Policy 7: Supporting communities

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary: Policy 7 Supporting communitiesNfk constabulary support the specific reference to crime, and that new police facilities will be provided to serve areas of major growth. The policy should however also refer to areas where police facilities are deficient and that all new development will be well designed, to include safe and accessible spaces where crime and fear of crime are minimised.

Joint Core Strategy Proposed submission Document

S - 11529 - 8591 - Policy 7: Supporting communities - None

11529 Support

CHAPTER 5 Policy 7: Supporting communities

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We acknowledge and endorse the observation in Policy 7 that all development will be expected to maintain or enhance the quality of life and well being of communities. Policy 10 of the PSD states that the spatial strategy for Long Stratton is intended to ensure the delivery of a bypass. The provision of a Long Stratton bypass, secured in conjunction with new housing/commercial development, will substantially enhance the quality of life for the existing residents of the settlement. The master plan that will be produced for Long Stratton will demonstrate "integration and cohesion within and between new and existing communities." The strengthening of community cohesion will constitute an integral element of the master plan/design process. We acknowledge the comment in policy 7 regarding care home provision and would note that new facilities could be accommodated within the expansion of Long Stratton anticipated by virtue of the content of Policies 9 and 10 if the PSD.

Joint Core Strategy Proposed submission Document

O - 11542 - 8597 - Policy 7: Supporting communities - iii

11542 Object

CHAPTER 5 Policy 7: Supporting communities

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living notes that policy 7 requires provision of community infrastructure to support housing growth. Whilst generally supportive of the main thrust of the policy, Blue Living is concerned by a number of aspects relating to it. The policy states that Health Impact Assessments will be required for large-scale housing proposals. Firstly neither the policy nor the glossary clearly define what 'large-scale' actually means and therefore, a lack of clarity as to the interpretation of the policy albeit it would be hard to argue NE Norwich proposals are not large-scale but may be of more wider concern. Secondly, it is considered that this is a particularly onerous requirement for which there is no firm policy or legislative justification. The policy also states that new police facilities will be provided to serve areas of major growth. Again the terminology is unclear. Blue Living has assumed by areas of major growth it is meant the identified strategic growth locations but the wording could be more clear and precise to avoid confusion. The principle of providing facilities in all growth locations appears onerous and it is unclear why these are required or what type of facilities are being sought. Again, there is limited justification and evidence as to why this requirement is necessary. The policy also refers to support for community development workers to help integration and cohesion between new and existing communities. The implication is that this could ultimately be a S106 requirement. There is limited justification and evidence as to why this requirement is necessary. More generally the policy fails to clarify how these requirements will be delivered and also needs to recognise the issues surrounding viability and delivery as part of strategic growth proposals. In this regard the delivery of the full range of infrastructure being sought at NE Norwich is unlikely to be viable and deliverable with the scale of growth being proposed. Moreover, it is also appropriate that where development proposals are expected to deliver community infrastructure that the extent and nature of provision being required is based on up-to-date assessments of needs arising from the development in question and the policy should reflect this in accordance with guidance within circular 05/05

Joint Core Strategy Proposed submission Document

S - 11626 - 7523 - Policy 7: Supporting communities - None

11626 Support

CHAPTER 5 Policy 7: Supporting communities

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

O - 11647 - 4685 - Policy 7: Supporting communities - i

11647 Object

CHAPTER 5 Policy 7: Supporting communities

Respondent: Mr Peter Adams [4685]

Agent: Tetlow King Planning (Ms Rachel Coles) [8611]

Full Text:

Summary: Page 52 mentions the expansion of care homes but it is important that the Districts recognise that there is a need to expand the provision of other types of care and accommodation for older people to meet their range of care needs throughout their older years. A Continuing Care Retirement Community offers a range of accommodation and care packages to allow older people to 'age in place' and to have the support they requires adjusted as and when they require. Paragraph 5.31 refers to the need identified by Norfolk County Council Adult Social Services indicate that in excess of 500 additional housing with care dwellings (also known as extra care housing) will be required across the area by 2026. We consider that this is an underestimate and that as the population ages further the need will increase substantially. There is therefore a need to address this need in policy terms to guide the development of care and accommodation schemes for older people in the future.

Joint Core Strategy Proposed submission Document

S - 11656 - 8366 - Policy 7: Supporting communities - None

11656 Support

CHAPTER 5 Policy 7: Supporting communities

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. The BLT recognise that new infrastructure will be required to support growth and that planning for this will require a multi-agency approach and joint working. The BLT broadly support this policy. The BLT look forward to an early dialogue with the respective public bodies/agencies responsible for delivery to consider new and innovative approaches to funding community infrastructure in partnership arrangements between the public and private sector.

Joint Core Strategy Proposed submission Document

O - 11718 - 8618 - Policy 7: Supporting communities - i, ii

11718 Object

CHAPTER 5 Policy 7: Supporting communities

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary: Policy 7 deals with Health, Education, Crime and Community Infrastructure. With regard to Health the policy requires "Health Impact Assessments" to be prepared for large-scale housing proposals. We question the need for this and how they will be used, upon which the plan is silent. An indication of the matters to be covered in such documents would assist. The policy also calls for provision to be made for the expansion of the Norwich and Norfolk University Hospital but no indication is given as to how this will be achieved and therefore how it will be delivered. The policy, or supporting text, needs to be more explicit. Paragraph 5.52 suggests that over 1,000 additional specialist dementia care homes and care homes with nursing places addressing various needs will be required by 2026. This is a huge undertaking yet again no idea is provided, even strategically, as to how this is to be achieved/delivered. Guidance is required on the most suitable locations for such uses.

Joint Core Strategy Proposed submission Document

S - 11271 - 8263 - Policy 8: Culture, leisure and entertainment - None

11271 Support

CHAPTER 5 Policy 8: Culture, leisure and entertainment

Respondent: The Theatres Trust (Ms Rose Freeman) [8263] Agent: N/A

Full Text:

Summary: We support this Core Strategy in respect of Objective 8 and Policy 8 as this objective and policy contain all the elements required for a thoughtful and forward looking framework for the future cultural needs of the Broadland, South Norfolk and Norwich City. Good quality community and cultural facilities are essential components in the development of sustainable communities and it is important to provide, protect and promote cultural facilities for their leading role in the quality of life for the area. However we suggest that the use of the term 'high brow' at ¶5.53 is unnecessary and request this term be replaced with a more inclusive description of the cultural offer which could be described as Facilities that provide for the leisure, cultural, sport and recreational needs of the community and include festivals, theatre, cinema, museums, playing fields, leisure centres, landscape, heritage and tourism.

Joint Core Strategy Proposed submission Document

O - 11338 - 8570 - Policy 8: Culture, leisure and entertainment - i, ii, iii

11338 Object

CHAPTER 5 Policy 8: Culture, leisure and entertainment

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 8 fails the Justified, Effective and National Policy soundness tests. Hethersett Land Ltd notes that Policy 8 requires the provision of cultural, leisure and entertainment facilities to support housing growth. Whilst the general thrust of this policy is consistent with the widespread aim of creating, mixed, balanced and sustainable communities and is supported, Hethersett Land Ltd suggest that the ability of providing such infrastructure without public subsidy is limited at the growth locations because the scale of development has been restricted to meet political aspirations, rather than sustainability reasons and without regard to scheme viability and delivery. Hethersett Land Ltd considers that the policy is unsound in that it is not justified as being the most appropriate strategy. The policy states that development will be expected to provide for a range of cultural and leisure facilities. The wording of the policy suggests an indiscriminate rather than a proportionate, needs driven approach to such provision which would clearly be contrary to the provisions of Circular 05/05. In particular, whilst it is not clearly defined, the requirement for developments of any size to 'provide for' performance space appears unreasonably onerous (depending upon how 'performance space' is defined) and is neither consistent with the tests in Circular 05/05 nor justified by the evidence base. The policy needs to be re-worded such that it is clearer and easier to interpret and provides a more proportionate, needs based approach consistent with Government policy and the evidence base.

Joint Core Strategy Proposed submission Document

S - 11175 - 7620 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11175 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: IE Homes & Property Ltd (Mr Ed Palmieri) [7620] **Agent:** N/A

Full Text: For the delivery of 1800 new homes in South Norfolk NPA there needs to be great flexibility in use of the settlement hierarchy in determining new housing numbers as some locations are more able to sustainably take new homes than others and the settlement hierarchy is far too prescriptive eg locations along the A140 and near to Long Stratton such as Tasburgh whilst currently classed as a service village could take more than smallscale (50) new housing numbers given the advantages of the A140 bus service and being close to Long Stratton.

Summary: For the delivery of 1800 new homes in South Norfolk NPA there needs to be great flexibility in use of the settlement hierarchy in determining new housing numbers as some locations are more able to sustainably take new homes than others and the settlement hierarchy is far too prescriptive eg locations along the A140 and near to Long Stratton such as Tasburgh whilst currently classed as a service village could take more than smallscale (50) new housing numbers given the advantages of the A140 bus service and being close to Long Stratton.

Joint Core Strategy Proposed submission Document

O - 11194 - 6883 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11194 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "significant expansion of ... in particular, science park activity at the University of East Anglia/Norwich Research Park. Need to limit development of UEA campus (already overstuffed with buildings) and Research Park, at risk of destroying Yare valley corridor.

Summary: "significant expansion of ... in particular, science park activity at the University of East Anglia/Norwich Research Park. Need to limit development of UEA campus (already overstuffed with buildings) and Research Park, at risk of destroying Yare valley corridor.

Joint Core Strategy Proposed submission Document

O - 11195 - 6883 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11195 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "an extension to Broadland Business Park of around 25ha for general employment uses" Broadland Business Park is already proving to be damaging to central Norwich (e.g. Aviva's moves from the city centre) and is difficult to reach from the city except by car. Its expansion should be limited, at least until a station halt is built.

Summary: "an extension to Broadland Business Park of around 25ha for general employment uses" Broadland Business Park is already proving to be damaging to central Norwich (e.g. Aviva's moves from the city centre) and is difficult to reach from the city except by car. Its expansion should be limited, at least until a station halt is built.

Joint Core Strategy Proposed submission Document

O - 11196 - 6883 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11196 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "6.7 The Northern Distributor Road (NDR) ... will improve quality of life and enable significant enhancement of public transport, cycling and walking..."The NDR will simply cause more traffic and reduce the quality of life for those living near it. It will cut existing cycle routes (St. Faith's Lane in particular). People in the city centre will be adversely affected too as the countryside becomes ever further away. As stated later, it will cause urban expansion around Old Catton, Sprowston etc. (p62).

Summary: "6.7 The Northern Distributor Road (NDR) ... will improve quality of life and enable significant enhancement of public transport, cycling and walking..."The NDR will simply cause more traffic and reduce the quality of life for those living near it. It will cut existing cycle routes (St. Faith's Lane in particular). People in the city centre will be adversely affected too as the countryside becomes ever further away. As stated later, it will cause urban expansion around Old Catton, Sprowston etc. (p62).

Joint Core Strategy Proposed submission Document

O - 11202 - 8507 - Policy 9: Strategy for growth in the Norwich Policy Area - ii

11202 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr R Smith [8507]

Agent: Beacon Planning Ltd (Ms Jenny Page) [7833]

Full Text:

It is appreciated that a strategy needs to be in place to ensure sustained delivery over the LDF period. Meeting the stated housing targets or achieving anywhere near those targets within the next five years is widely accepted to be unachievable under the current financial climate. There is a vital need to revise the approach or at the very least be realistic and consider this scenario without delay. Larger sites unavoidably need considerable effort to implement, notably the provision of substantial infrastructure up front. The implementation of small to medium sites without significant constraints are the ones which can come forward first and can deliver vital housing within the short term. The policy does not recognise that infrastructure constraints in the Norwich Policy Area are critical. More than one key stakeholder has referred in very recent documents to elements of the necessary infrastructure provision as 'showstoppers' if the funding cannot be found to deliver them. GNDP in their own letter dated 13 November 2009 to EERA regarding the East of England Plan Review to 2031 clearly recognise that the current situation is critical in delivering the stated requirement to 2021 let alone beyond. With regard to infrastructure GNDP state: 'It is becoming clearer that the impact of the recession on public finances and private lending will result in less public investment and more constrained developer funding, particularly in the early review period.' GNDP identifies a wide range of infrastructure is required to deliver growth. It warns that: 'there are significant showstoppers without which the current scale of growth cannot be delivered, let alone any additional growth. The letter goes on to outline the 'showstoppers' which include strategic green infrastructure, water infrastructure, the Northern Distributor Road, A47 Southern Bypass junction improvements and the Long Stratton Bypass. With the possible exception of green infrastructure all other elements will require front loaded funding through public sector investment. Norfolk County Council in responding to the East of England Plan Review to 2031 (report to Cabinet dated 9 November 2009) stated: 'the County was facing a huge challenge to deliver the 78,700 homes required to 2021.' It emphasises that the recession will have a severe impact on housing delivery for at least five years. It further states that 'In addition, it is clear that sources of public and private funding for infrastructure are effectively drying up.' The County Council conclude that 'there is a strong likelihood that we will be faced with trying to build more housing without the infrastructure to deliver sustainable communities.' The GNDP in the DPD must consider practical solutions to deliver at least some of the housing requirement in a sustainable manner in the short term. Effective: Failure to recognise the fundamental infrastructure constraints in delivering the housing targets in the DPD, alternative scenarios if funding not forthcoming and the potential for smaller sites to deliver housing

Summary:

It is appreciated a strategy needs to be in place to ensure sustained delivery over the LDF period. Meeting or achieving anywhere near the housing targets, particularly within the next five years is widely accepted to be unachievable under the current financial climate. GNDP and Norfolk County Council have stated that elements of the necessary infrastructure provision are 'showstoppers' if up front funding cannot be secured, eg NNDR. In the absence of funding the DPD must include practical solutions, such as development on smaller sites, to meet targets.

Joint Core Strategy Proposed submission Document

O - 11225 - 8542 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11225 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: No significant expansion at Longwater is proposed. Identifying the site in policy does not accord with paragraph 4.6 of PPS12 which states that strategic sites should be those considered central to achievement of the strategy.

Summary: No significant expansion at Longwater is proposed. Identifying the site in policy does not accord with paragraph 4.6 of PPS12 which states that strategic sites should be those considered central to achievement of the strategy.

Joint Core Strategy Proposed submission Document

O - 11226 - 8542 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11226 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

The Arup Study of job growth and land requirements places insufficient emphasis on the availability of sites to drive job creation. The focus of the Arup Study appears to be on non-land use measures to deliver growth. We acknowledge the importance of such softer measures, however, we consider that a major element of the strategy must be to ensure that sufficient land is delivered to facilitate the provision of employment floorspace. Indeed, the Arup Study identifies (at para. 1.14) that there is a shortage of available land for development. Given this conclusion we are concerned that the Core Strategy fails to deliver sufficient sites of the right type in the right location at the right time and that this will be a constraint on development. The strategy is reliant on sites which are constrained and unlikely therefore to deliver, particularly in the short term. Whilst we support growth of Science Park activity at UEA, this site is constrained by access and land ownership issues and specifically reserved to meet the needs of the high tech' sector. Studies demonstrate the importance of the growth in high tech' sector and we agree that land should continue to be reserved for such uses. However, as a result there is a need to ensure that the strategy provides for opportunities elsewhere for other economic sectors to grow. We acknowledge the growth of the airport as an important driver of the local economy. However, the Arup Study suggests that this land will be required for uses directly-related to the airport. Such an approach is consistent with the approach previously pursued at Norwich and at other airports. Whilst such an approach supports growth of the economy there is a need to ensure that opportunities exist elsewhere for other non-aviation related businesses to grow. In addition, major growth at the airport will be dependent upon significantly improved access arrangements which are unlikely to be forthcoming in short to medium term. Based on the recommendations of the Arup Employment Study the policy allocates growth at Longwater. Arup's conclusions appear to be based on comments in the supporting text in the South Norfolk Local Plan (SNLP) regarding the future potential of such land. The comments in the SNLP do not constitute policy. It is necessary therefore to compare Longwater against other potential locations. The Arup Study does not appear to do this and further consideration needs to be given to the alternative locations for strategic employment provision. The Arup report also contends that Longwater is a good location for further business park activity. This is despite the fact that Longwater has proven to be an unattractive location for such activity over recent years. Longwater was allocated by the SNLP for B1/B2/B8 uses, but is dominated by retail and quasi-retail uses which in turn impacts on the perception of Longwater as a strategic location for industrial, office and warehousing development. No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. Conversely, there is clear evidence that locations south of the City are strongly in demand for industrial, office and warehousing development. In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Addressing the employment challenges of the City Region requires actions on a number of fronts. The prime means of facilitating employment growth through the planning system is through the allocation of sites for development in appropriate locations. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery. Harford Bridge is strategically located on the southern side of Norwich in an area which business demands as a location. It is well placed to build on the success of the Broadland Business Park as a location and is immediately available for development. Our clients continue to receive firm interest from employers and developers regarding the site, demonstrating that this site is an area of strong market demand as an employment location. Harford Bridge performs well against a number of important principles: Accessibility - at the heart of the strategy of the EEP is that Norwich as a major centre is a highly sustainable location for development. Rightly, the emerging Core Strategy seeks to accommodate the majority of development in and on the edge of Norwich owing to its greater accessibility. Although located on the urban edge the site is accessible by a range of modes of travel, being located in a Corridor of Movement (TRA13 of the SNLP). The site is served by bus services 10 (Mulbarton-Norwich-Spixworth) and 18 (Long Stratton - Norwich - Old Catton). These provide a twice-hourly service. In addition, the site is served by the Harford Park and Ride site which provides Monday to Friday a 7-10 minute service off peak, and every 5 minutes during peak periods. Job Proximity Principle - significant housing growth is to take place at Norwich. Harford Bridge is well-located to capitalise on growth in labour supply. The case for employment growth on the south side of the city is further strengthened by the identification of Long Stratton for strategic scale housing growth

Infrastructure - Harford Bridge takes advantage of existing infrastructure, being located in a Corridor of Movement and having good public transport accessibility. Environmental impact - No national environmental designations would be affected by development. That part of the site which is at risk from flooding would remain free from development and the drainage strategy would ensure that site run-off is maintained at greenfield rates. Development would be set back from the River Valley to ensure that the character of the valley is maintained. Land around the River Valley would be opened up for public access. The area around the Scheduled Ancient Monument would remain free from development. Whilst there would be some local environmental impact, significant landscaping would mitigate against any impact and a comprehensive strategy of ecological enhancement would be implemented. There would be significant Climate Change benefits from locating development on the edge of Norwich. Market delivery - there are no major constraints to development, the landowners are actively seeking to bring the site forward and the site is immediately available for development. Crucially, it is located in that part of the City Region where market demand is strongest. The site is deliverable, developable and available. Timescales - the site is immediately available for development and can make a significant contribution toward growth needs to 2026. Resources - development at Harford Bridge would not sterilise important resources. Land at Harford Bridge is ideally located to assist in driving the economic growth aspirations for Greater Norwich. It meets the expectations of employers and investors and provides the opportunity to develop a high quality setting employment area and enhance an important gateway into the City.

Summary:

Land at Harford Bridge is ideally located to assist in driving the economic growth aspirations for Greater Norwich. It meets the expectations of employers and investors and provides the opportunity to develop a high quality setting

Joint Core Strategy Proposed submission Document

O - 11226 - 8542 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11226 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

employment area and enhance an important gateway into the City.

Joint Core Strategy Proposed submission Document

O - 11227 - 8542 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11227 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: In relation to Policy 9 we argue that an additional strategic allocation should be made at Harford Bridge. As a consequence an additional bullet is required explaining the role of Harford Bridge .

Summary: In relation to Policy 9 we argue that an additional strategic allocation should be made at Harford Bridge. As a consequence an additional bullet is required explaining the role of Harford Bridge .

Joint Core Strategy Proposed submission Document

O - 11246 - 8547 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11246 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: First paragraph of 6.2 is not consistent with the policies in the plan nor with paragraph 6.3. The plan sets out a hierarchy for allocating development, with Easton identified for a strategic level of development in recognition of its location close to the urban edge of Norwich and accessibility by existing and proposed public transport infrastructure. Policy NR1 of the East of England Plan seeks a major shift in travel within the NPA towards public transport, cycling and walking. This can be achieved by locating development close to Norwich within public transport corridors. This need to be reflected in the hierarchy.

Summary: First paragraph of 6.2 is not consistent with the policies in the plan nor with paragraph 6.3. The plan sets out a hierarchy for allocating development, with Easton identified for a strategic level of development in recognition of its location close to the urban edge of Norwich and accessibility by existing and proposed public transport infrastructure. Policy NR1 of the East of England Plan seeks a major shift in travel within the NPA towards public transport, cycling and walking. This can be achieved by locating development close to Norwich within public transport corridors.

Joint Core Strategy Proposed submission Document

S - 11247 - 8547 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11247 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

We support the principle of growth at Easton Easton College, the Royal Norfolk Agricultural Association (RNAA), The Diocese of Norwich and Easton Estates have been working together with Easton Parish Council to develop a vision for the expansion of the settlement of Easton and to improve the educational facilities at the College. It is the collective view of the partners that a moderate increase in the size of the village will enhance its form and character, support additional facilities, provide for better traffic circulation and improve services. In short the partners consider these proposals as a means to create a more attractive, sustainable and viable village community. The landowners have been working together to produce a masterplan for the growth of the village. The masterplan demonstrates that modest growth, c1,000 homes can be delivered at Easton over the plan period and that there are no insurmountable obstacles to delivery. The partners masterplan for Easton:- Demonstrates how at least 1,000 new homes can be delivered- Enhances local services through an enhanced village centre, including additional primary school accommodation and opening up the College's sports facilities for greater public use- Supports the development of a bus rapid transit system to the city centre- Enhances bus and cycle links to the city centre, Norwich Research Park Easton College and to other facilities- Provides improved cycle and pedestrian access to employment sites- Removes college traffic, including heavy service vehicles, from the village through the delivery of a new access route to the college

Summary:

Easton College, the RNAA, Diocese of Norwich and Easton Estates have been working together with Easton Parish Council to develop a vision for the expansion of the settlement of Easton and to improve the educational facilities at the College. It is the collective view of the partners that a moderate increase in the size of the village will enhance its form and character, support additional facilities, provide for better traffic circulation and improve services. In short the partners consider these proposals as a means to create a more attractive, sustainable and viable village community.

Joint Core Strategy Proposed submission Document

S - 11253 - 7606 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11253 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: The Greetham Trustees [7606]

Agent: Strutt and Parker (Mr David Williams) [7605]

Full Text: Strutt and Parker supports the spatial vision and the strategy to allocate moderate levels of growth to the other towns and larger villages across the area, supported by new local jobs, services, community facilities and other infrastructure.

Summary: Strutt and Parker supports the spatial vision and the strategy to allocate moderate levels of growth to the other towns and larger villages across the area, supported by new local jobs, services, community facilities and other infrastructure.

Joint Core Strategy Proposed submission Document

S - 11254 - 7606 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11254 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: The Greetham Trustees [7606]

Agent: Strutt and Parker (Mr David Williams) [7605]

Full Text: Policy 9 is also supported based on the strategy for growth in the Norwich Policy Area and the 1,800 new homes in the South Norfolk portion of the NPA. It is considered that the sites under the ownership of the Trustees of the Greetham No2 settlement can contribute to the provision of smaller housing sites within the Norwich Policy Area at Service Villages.

Summary: Policy 9 is also supported based on the strategy for growth in the Norwich Policy Area and the 1,800 new homes in the South Norfolk portion of the NPA. It is considered that the sites under the ownership of the Trustees of the Greetham No2 settlement can contribute to the provision of smaller housing sites within the Norwich Policy Area at Service Villages.

Joint Core Strategy Proposed submission Document

S - 11285 - 2373 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11285 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Persimmon Homes (Anglia) [2373]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

This policy sets out the broad strategy for growth in the Norwich Policy Area. We support the view that a minimum of 21,000 dwellings needs to be allocated across the area and in particular that 1,800 dwellings should be allocated at Long Stratton. Whilst it is envisaged that this would form a major urban extension to the town and also provide funding towards the provision of the Long Stratton bypass, it is important to note that opportunities should also be taken for infill development in the town where it can be demonstrated that this would add to the sustainability of the settlement. This is why we agree with the approach that the 1,800 dwellings should be a minimum target to be achieved. In order to fund the proposed Long Stratton bypass it is crucial that sufficient development is allocated to support delivery of the bypass. Therefore infill development should also be permitted within Long Stratton.

Joint Core Strategy Proposed submission Document

O - 11297 - 8260 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11297 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary:

I do not feel that, as it stands, this proposed submission document is adequate to meet the requirements for geodiversity, as laid out by PPS9. Although his version of the Joint Core Strategy now reads well and has clear objectives and policies, it is so different from previous versions that I have commented on, as to require a new set of comments and recommendations.

Joint Core Strategy Proposed submission Document

O - 11324 - 6826 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11324 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary:

The JCS is not being compliant with the RSS Review in the timescale for housing allocations beyond 2021 to 2026. Furthermore, all indications point to a lower scenario for housing and economic growth than the RSS 'roll-over'. Particularly, the overall levels of growth are too high for the north east sector - 'the growth triangle' and out of alignment with the locations of strategic employment growth and the prospects of new jobs in this area. The housing numbers proposed for Wymondham and Long Stratton are greater than can be assimilated without radically changing the character of the settlements. The NDR will not improve the quality of life in the north east sector, or reduce traffic congestion. It does not support sustainable growth or 'make space' for public transport. It will embed car dependency, increase traffic on the radial roads, and increase CO2 emissions. It will not improve job prospects in the north east of the county but pull away businesses seeking proximity to Norwich. The NDR also sits very poorly with the concept of an eco-town, which would account for half the housing growth in the sector to 2026. The overall office space of 250,000sqm in the City Centre, Norwich Research Park and Broadland Business Park is difficult to justify with a recession that is affecting finance and commerce. Proposed expansion at Broadland Gate will become a large out-of-town competitor to the City Centre and is not desirable. Housing completions for the year 2001-2008 showed a sharp lift in the years 2006/07 and 2007/08, as shown by the housing trajectory in appendix 6. The trajectory figures post-boom have no solid evidence base and will not, in the present uncertainty. A major but little discussed issue is the level of affordable housing as a proportion of all housing. Data accompanying the RSS Review showed this to be 22% for the Greater Norwich Area. Although about three times better than for rural areas, as well as Yarmouth and Waveney, it falls a long way short of the region overall target of 35%, even in the times of strong housing growth.

Joint Core Strategy Proposed submission Document

O - 11339 - 8570 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11339 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd supports Hethersett's inclusion as a strategic growth location in Policy 9. However, Hethersett Land Ltd objects to the restriction on the scale of growth at Hethersett to 1000 dwellings. Hethersett Land Ltd contends that the restriction of 1000 homes at Hethersett suggested in Policy 9 fails the Justified and Effective soundness tests because it: * does not reflect the GNDP's own evidence, that indicates a higher level of growth ought to have been proposed; * has uncertain prospects of delivery, given the infrastructure costs at Hethersett and the JCS's policy requirements for infrastructure to support new development; * is internally inconsistent with other JCS aims and objectives; * does not reflect the results of the issues and options consultation * Is not the most appropriate strategy when considered against the alternatives * is insufficiently flexible to deal with changing circumstances. Hethersett Land Ltd contend that the JCS should have indicated a larger scale of growth at Hethersett, as underpinned by the evidence and as previously included in earlier JCS consultation documents. Main representation: Introduction Hethersett Land Ltd notes that Policy 9 sets out the growth distribution strategy for the Norwich Policy Area. Growth is proposed to be focussed in the city's urban area, a strategic urban extension to the North East of Norwich, with lesser growth in a limited number of Broadland fringe parishes; and a growth dispersal approach across South Norfolk district with 'strategic' growth split between a number of settlements and "smaller" scale growth to other unspecified locations in the Norwich Policy Area, with no indication of the level of actual level growth at each of these smaller settlements. At Hethersett growth is limited to 1000 homes. This is a significant change from the initial spatial strategy which proposed 4000 homes at Hethersett, based on the delivery of viable sustainable development, including a new high school and transport and utilities infrastructure improvements. Lack of a robust and credible evidence base Hethersett Land Ltd contends that the JCS Policy 9 fails the Justified soundness test, because it is not based on robust and credible evidence. Hethersett Land Ltd suggest that it can be demonstrated that the GNDP's decisions to limit the scale of growth at Hethersett to 1000 homes, have been based on seeking to achieve political aspirations, rather than on the basis of evidence; and although attempts have been made to 'retro-fit' evidence to support a lower figure at Hethersett, it still does not properly underpin this element of the Spatial Strategy. It is also contrary to Officer's original recommendations on the preferred growth scenario, which indicated a higher housing figure for Hethersett. Hethersett Land Ltd suggest that there are still gaps in evidence to substantiate the lower level of growth at Hethersett, particularly the delivery of the secondary school solution, which was originally one of the key factors underpinning the JCS's spatial strategy. Given its importance in delivering sustainable communities, this is a significant failure. Also, none of the new evidence that has been published since the GNDP's decision to reduce the housing numbers at Hethersett in December 2008 would indicate the original proposals for a higher level of growth at Hethersett was unsound. Deliverability Hethersett Land Ltd contends that the JCS Policy 9 fails the Effective soundness test, because it cannot be demonstrated that it results in a viable and deliverable strategy.

Hethersett Land Ltd are also concerned is that there is a lack of evidence demonstrating that 1000 homes at Hethersett is viable and therefore deliverable, given the requirements for infrastructure to support it and other JCS policy requirements, such as affordable homes, achieving sustainable code levels etc. Indeed, Hethersett Land Ltd note that the evidence included in the EDAW Growth Infrastructure study, would suggest that for Hethersett, if public funding cannot be found or infrastructure requirements reduced, that there are serious question marks about the ability of 1000 homes to generate sufficient value to fund the necessary infrastructure and make the release of land worthwhile, even if linked to the provision of homes at Cringleford/Colney. Whilst the site is physically capable of delivering 1000 homes it is contended that the original higher figure would deliver more significant planning benefits for the settlement more in accord with the JCS's Vision and Objectives for sustainable communities and the Act's requirement to contribute to achievement of sustainable development (see below). Failure to meet objectives Hethersett Land Ltd contends that the JCS Policy 9 fails the Effective soundness test, because it cannot be demonstrated that it helps achieve the JCS's objectives for sustainable development. Hethersett Land Ltd notes that JCS objective 1 is to minimise the contributors to climate change. The SA report suggests that a way to do this is to focus new homes close to jobs, services and facilities, so that the need to travel by the private motor car, a key contributor to CO2 emissions is reduced. By artificially limiting growth at Hethersett, based on the evidence that suggests a higher amount could be accommodated there and instead distributing growth throughout South Norfolk an opportunity has been lost to put more new homes in a sustainable location close to jobs, services and facilities. The result is a strategy that inevitably will increase the need to travel by private motor car, which is a key contributor to CO2 emissions and climate change and is directly at odds with this objective. Also, the ability to provide a local district heating scheme is less likely with a smaller scale of development. Hethersett Land Ltd notes that JCS objective 2 is to allocate enough land for housing in the most sustainable settlements. However, the GNDP's own evidence, including the Sustainability Appraisal, the Housing Topic Paper and that put forward by respondents to previous consultations would demonstrate that Hethersett could accommodate more than 1000 homes without breaching sustainability objectives. Indeed, a higher housing figure would be more likely to achieve sustainability objectives. The JCS's strategy of limiting growth at Hethersett and

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O - 11339 - 8570 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11339 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

spreading it around South Norfolk is therefore at odds with this objective. The SA demonstrates that spreading growth does not result in sustainable patterns of settlement and travel. Hethersett Land Ltd notes that JCS objective 6 is to make sure people have ready access to services. However, the EDAW report prepared under the instruction of the GNDP themselves helps to indicate that there are serious viability issues concerning the delivery of infrastructure and services at Hethersett given their likely cost and the limited amount of development (1000 dwellings) that can contribute towards it. Hethersett Land Ltd notes that JCS objective 7 is to enhance transport provision and reduce travel need and impact. However, Hethersett Land Ltd notes the County Council's Public Transport Unit's response to the Favoured Option, which questions the ability of 1000 homes to justify a Bus Rapid Transport (BRT) system at Hethersett. It states that "...BRT is a key element of the Norwich Area Transport Strategy (NATs); and a key tool in achieving modal shift to non-car modes". However, by reducing the ability of it being delivered at Hethersett through limiting growth, it calls into question the ability of the JCS's objective 7 to be met, particularly the ambitions to reduce the need to travel by private motor car. Failure to reflect the result of consultations and engagement Hethersett Land Ltd contends that the JCS Policy 9 fails the Justified soundness test, because it is not fully reflect the result of consultations and engagement. The GNDP's Issues and Options Report of the Consultation Responses (pages 15, 16 and 17) suggests that: "The largest support, at 35%, was for the option of large scale urban extensions and a possible new settlement, against 31% in favour of dispersed growth in a large number of areas." Also, in terms of the Preferred locations for growth: "Within their own district, South Norfolk's own residents gave greatest preference to options in Long Stratton, Wymondham and the South-West Sector (Hethersett)....." The analysis suggests that the top preferences for individual locations were the north east sector; south west sector (Hethersett) and Wymondham. For instance, 35% of respondents supported large scale urban extensions, including South Norfolk residents. Also, 53% of respondents supported a growth strategy concentrating on the North East, South West (Hethersett) and Wymondham either alone or with one or more additional settlements. Some 24% of responses preferred an option with a more dispersed pattern of at least 10 locations. Not the most appropriate strategy when considered against the alternatives Hethersett Land Ltd contends that the JCS Policy 9 fails the Justified soundness test, because it does not propose the most appropriate strategy when considered against the alternatives. Hethersett Land Ltd suggests that the most appropriate strategy would have been to maintain the higher level of growth at Hethersett as previously proposed and supported by Officers, based on the available evidence and responses to the Issues and Options Technical Consultation. This strategy would have provided better prospects of delivering a sustainable community at Hethersett, including providing the supporting infrastructure, services and facilities. It would also better contribute towards the 2004 Act's requirement for decisions to be made in light of the need to achieve the objective of sustainable development. Hethersett Land Ltd also suggest that Policy 9 should have acknowledged Hethersett's proximity to jobs at the Norwich Research Park, City Centre, Hethel etc and the ability to access them by non-car means. Also, that all these locations close to Hethersett are proposed for further job growth. The most appropriate approach for housing growth at Hethersett would be to link it to jobs and job growth in these locations, and not to artificially limit it for political reasons. Also, Policy 9 should also have acknowledged that as well as building on the linkages to jobs close by at the NRP and the City Centre etc. that it is important that some employment development is directed to Hethersett, both in the interests of creating mixed, balanced, sustainable communities and to reflect its strategic location close to Norwich and within the A11 corridor which is identified within the RSS as a focus for growth. Inflexibility Hethersett Land Ltd contends that the JCS Policy 9 fails the Effective soundness test, because does not include sufficient flexibility to take account of changing circumstances. Hethersett Land Ltd contends by limiting Hethersett's growth to 1000 homes it fails reflect changes in viability and market conditions; or a possible uplift in housing numbers that may come about through an RSS review; or the under delivery of other locations elsewhere in the Norwich Policy Area, such as that linked to the Norwich Northern Distributor Road delivery. Conclusion The GNDP's strategy to limit growth at Hethersett to 1000 homes raises a number of soundness issues. The main consequence of the approach is that it calls into question the viability of delivering a sustainable community at Hethersett, given the likely infrastructure costs, and other policy requirements. A more appropriate strategy would have been to provide for a greater number of homes at Hethersett, in light of the evidence and in accordance with the Officer's recommended preferred option. This strategy would have provided better prospects of delivering a sustainable community at Hethersett, including providing the supporting infrastructure, services and facilities. It would also better contribute towards the Act's requirement to seek to secure the objective of sustainable development and the JCS overall ambitions for the creation of sustainable communities.

Joint Core Strategy Proposed submission Document

S - 11356 - 2373 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11356 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary:

The strategy is supported in principle, in relation to South Norfolk and Wymondham in particular, as it provides the opportunity for a range of smaller sites to be developed to help deliver housing in the earlier years of the plan. A strategy that spreads the new housing development in a larger number of smaller developments carries less risk of delay and can make better use of existing infrastructure between various developers. The much shorter lead in period and spread of site and developers would also mean that it would be possible to take full advantage in due course of an improved housing market to achieve the delivery of the required increase in housing. Persimmon Homes Anglia have an interest in a 9 hectare site at Norwich Common, Wymondham, which offers the opportunity to provide some 300 dwellings on a site close to existing employment opportunities, very well served by existing services and facilities and with good pedestrian, cycle and public transport links to the town centre and Norwich. They are actively promoting this site through the LDF and SHLAA processes. It would be their intention to develop this site at the earliest opportunity. The attached document provides further information on the suitability and deliverability of the site.

Joint Core Strategy Proposed submission Document

O - 11372 - 8627 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11372 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: The evidence base, including SHLAA and GNIN&F2009, has not informed the JCS. Objection 2: Lack of logical and complete justification for submitted option. Objection 3: Presence of misleading evidence on infrastructure costs and inaccurate representation of such costs. Objection 4: Need more flexible/responsive housing land supply (there is a need for a 12.5% contingency). Objection 5: Failure to deliver a 5 year housing supply and 2021 RSS target. Objection 6: The current JCS pattern of growth is dispersed and will miss an opportunity to deliver critical new infrastructure. OBJECTIONS/SUPPORT FOR POLICY 9.2.1 This entire section looks in detail at Policy 9 of the JCSPS and the evidence base that has been developed in order to inform the proposed pattern of growth. 2.2 We object to the pattern of growth laid out under Policy 9 and propose the following approach instead (Table 4).

Location	No of dwellings	Comments
Norwich	3,000	Constrained by flatted commitments
Broadland (smaller/medium sites)	5,000	Medium sites up to 500 dwellings
South Norfolk (smaller/medium sites)	4,750	Medium sites up to 500 dwellings
NE Norwich and Rackheath Eco Town Strategic Site	7,000	Alteration to strategic site release rising to 10,000 post 2026
Wymondham Strategic Site	6,500	Alteration to strategic site release (4,000 by 2026)
Total	26,250	23,750 to 2026 + 2,500 post 2026

Table 4: Revised Proposed Pattern of Growth in NPA2.3 Our reasons for objecting to the proposed pattern of growth are explored below, but essentially it responds to the criticisms of the Norwich Common Inspector and provides an earlier way of releasing the two major allocations through strategic site allocations in the JCPS and flexibility for early release of small, medium sites to respond to short falls in supply.

Requirement for a contingency 2.4 As detailed above in our comments on the five year land supply, in Appendix 1, the evidence indicates that the GNDP are increasingly missing the annual delivery target of housing, thereby creating a cumulative backlog which means that there is increased risk that the overall target will not be delivered. 2.5 LPAs are required by PPS3 to maintain a five year housing land supply. Based on the latest information available, there is only a 4.3 year housing supply. 2.6 It should also be stressed that the housing targets contained in the RSS are minimums. Furthermore, given that there is no provision for an alternative strategy or contingency in the event that some sites do not come forward, the GNDP should plan for a circa 12.5% contingency in housing delivery, i.e. our proposed total housing provision is greater at 26,250 versus 21,000 new homes contained in the JCSPS. Evidence base leading to wrong decision 2.7 In this section, we review in detail the key evidence base documents that informed the JCSPS. We have a number of concerns with respect to the evidence base for the JCSPS. One of the key questions pertaining to the soundness of Core Strategies is whether the content can be justified by the evidence and, whether the chosen strategy is the most appropriate given the reasonable alternatives, and whether sufficient reasonable alternative strategies were considered. Summary of evidence base problems 2.8 First, there is little robust justification behind the growth allocation detailed in Policy 9 of the JCPS. In particular, there is no reasoned justification why the allocation at Wymondham reduced from 5,000 homes (4,000 rising to a total of at least 5,000 after 2026 as stated on p. 72 of JCSReg25.2009) under Option 1 (of the Technical Consultation (JCSReg25.2008) to 2,200 in the JCSPS. 2.9 With respect to the evidence base gaps exist, as evidenced in the Pre Submission Review of the JCS (PreRJCS). The Planning Inspector found there to be a lack of evidence supporting Option 2a (which lowers the allocation of new homes in Wymondham to 2,200) and found that, as a result: "Further work would need to be carried out on option 2a, particularly in relation to the sustainability appraisal; deliverability; and its relationship to the overall vision and strategy, and general conformity with the RSS." (PreRJCS, Para 24) 2.10 The original EDAW report NPA - Infrastructure Need and Funding Study (GNIN&F2007) which was based on completely different growth scenarios to those presented in the JCSPS has only just been updated by GNIN&F2009. Given that the final version of the GNIN&F2009 was only published October 2009 and made public for the first time on the 2nd November 2009, it is doubtful that the findings of the GNIN&F2009 have been taken fully into account. Likewise, the Stage 8 SHLAA was first released in Sept 2009 and did not inform the previous consultations on the JCS. In other words, parts of the evidence base have been prepared in an attempt to retrospectively justify the growth option contained within JCSPS Policy 9.2.11 Within the GNDP evidence base there is a lack of a comprehensive facilities audit which established the quantity and range of social and physical infrastructure across the different settlements. This is fundamental to establishing a rigorous baseline from which to make informed decisions on the most sustainable locations for new development. BWP has carried out a detailed site audit for each of the settlements which establishes Wymondham as one of the most sustainable locations for growth. Conversely, the audit flagged Long Stratton as one of the least sustainable locations nevertheless a location earmarked for 1,800 new homes and the 1,000 dwelling proposal at Easton appears to be an enigma requiring detailed investigation. Despite this, Wymondham is allocated only 400 more dwellings than Long Stratton, which defies logic. This represents a significant gap in the evidence base as it provides a detailed picture of the existing levels of sustainability. There is also a lack of information presented on the existing levels of enrolment at local schools, which is imperative to the understanding of the potential impact of new development on school provision, particularly as this is seen as a key spatial objective. 2.12 Information presented in Appendix 5 of the JCSPS on school enrolments demonstrates that any new development will result in the need for at least one new primary school and a new secondary school at Wymondham given that existing facilities are operating over capacity. Despite the fact that Wymondham High School is operating at capacity, page 127 of the JCSPS provides no date for the delivery of a new secondary school before 2031. This is detrimental to achieving Objectives 5 and 6.2.13 There are a number of concerning anomalies with regard to the funding and cost cashflows located in

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Appendices A and D of the GNIN&F2009. For example, the entire £45 million cost of improvements to Thickthorn Junction, which will benefit other settlements in addition to Wymondham, is apportioned in its entirety to Wymondham, that could result in a CIL of circa £61,000 per dwelling as illustrated in the GNIN&F2009. This will act as a significant disincentive to house builders in Wymondham and will affect the delivery of the plan and could provide misleading evidence as a basis for determining the distribution of development. Costs presented in Appendices A and D are very general in nature and could be inaccurate (as conceded in the JCSPS) to the order of millions of pounds. Yet, despite this, there are attempts to use them to calculate a CIL. It is vital to have an accurate evidence base on costs and funding if the target level of housing growth is to be delivered with some certainty and the need will exist to examine these matters in far greater detail. 2.14 Despite allocating 2,200 new dwellings at Wymondham there is no reasoning as to how this specific number was arrived at. Nor is there credible explanation as to why this figure is considerably less than the 5,000 dwellings at Wymondham envisaged under Option 1 of the JCSReg25.2008. There is also no justification in either JCSReg25.2009 or JCSReg25.2008 as to what different levels of growth will achieve in terms of additions to existing infrastructure and what quantum of housing would be required to engender the necessary provision of new social and physical infrastructure. What is, however, clear from the costing data contained in the GNIN&F2009 is that if the allocations at Wymondham were increased to say 6,500 dwellings the suggested CIL would reduce to circa £27,000 per dwellings. Growth Options Topic Paper - June 2007 (SGOTP) 2.15 A number of topic papers were published in order to inform the JCS Issues and Options preparation. Of these, the Growth Options Paper provides some useful background on the different growth options considered. In section 7 of the Growth Options Paper, with respect to the spatial distribution of growth, it is noted that: "While in practice there will be a number of small scale growth opportunities, there appear to be distinct advantages to concentrating growth to ensure the provision of sustainable new communities that are well provided with services and as self-contained as possible." (SGOTP, p. 9) 2.16 The NPA considers the pros and cons of large versus small scale development sites. In particular, larger scale developments as urban extensions are highlighted as having the potential to support more sustainable development: "Larger scale urban extensions* Can be located to concentrate growth near to existing large scale services and job opportunities. They can also be genuinely "mixed-use" with supporting job opportunities and a wide range of new local services and would be much more likely to sustain high quality public transport. Large scale development is more likely to support sustainable initiatives such as Combined Heat and Power (CHP) and Sustainable Drainage Systems (SuDS). The provision of local services and the ability to masterplan the development as a whole would assist the formation of a coherent new "sustainable community"* Concentration of development would need careful planning to maximise dwelling delivery rates. However, even with a concentration strategy there would continue to be a choice of smaller sites and urban brownfield development" (SGOTP, p.8) 2.17 Wymondham is recognised for being well related to Norwich in strategic terms and, in addition, has an offer of existing services and employment opportunities in line with its status as a larger market town. It is also recognised as being well served by the main road network and is served by regular and frequent train services to Norwich and further afield. 2.18 It should be noted that the growth location of Long Stratton was not considered at this stage of the JCS preparation and only came later within the JCSReg25.2008 Consultation. 2.19 Despite the clear audit trail and evidence that acknowledges the advantages of Wymondham in terms of sustainability over other settlements and the acknowledged ability of a less dispersed growth strategy to bring forward benefits for local communities, the proposed pattern of growth under Policy 9 of the JCSPS contradicts these findings. The Greater Norwich Infrastructure Needs and Funding Study (Oct 2009) (GNIN&F2009) 2.20 The GNIN&F2009 categorises and prioritises the different elements of infrastructure with respect to its importance in delivering growth. Three categories have been identified: * Critical infrastructure: essential infrastructure that must happen to enable physical growth* Essential infrastructure: infrastructure that is required if growth is to be achieved in a timely and sustainable manner* Desirable infrastructure: infrastructure that is required for sustainable growth but is unlikely to prevent development in the short to medium term We make it clear that these definitions or the infrastructure related to these definitions appear in the JCPS contrary to PPS12 guidance.

Table 5: Summary of cost by type of infrastructure 2.21 Table 5 summarises the types of infrastructure by category and Page 197 of the GNIN&F2009 provides a break-out of the infrastructure costs by growth location as in Table 6. Table 6: Infrastructure Costs by Growth Locations and Prioritisation 2.22 It is clear from that the cost allocations across the different growth locations are inappropriate and misleading. Even at first glance, intuitively, it seems unlikely that Wymondham will require such a large amount of "critical infrastructure" especially vis-à-vis Long Stratton, which is a much smaller settlement with a smaller number and range of existing social and physical infrastructure. Appendix A of the GNIN&F2009 provides a detailed breakout of indicative costs and phasing of funding for individual pieces of infrastructure. This causes further concern as the costings presented appear to be highly misleading. An example of this is the fact that the entire £45 million cost of the Thickthorn junction, which will benefit not just Wymondham, but also settlements such as Hethersett, is apportioned to Wymondham, resulting in potential CIL cost of £61,071 per dwelling. Worryingly, such a high cost per dwelling, in the case of Wymondham, will act as a significant deterrent to investors and housebuilders and will impact on the delivery of housing. In this regard, the plan is unsound because overall delivery of the target housing growth will be compromised. 2.23 Further infrastructure costs presented in Appendix D of the GNIN&F2009 also raise concerns in that they are very general in nature and could be inaccurate to the order of millions of pounds. Nevertheless, there is an attempt to convert the costs into a CIL which implies that such costs present a realistic picture of required future infrastructure expenditure. On this basis, we cannot see how the GNIP can maintain that the Plan is sound as the matter of infrastructure cost and funding appears too general and misleading. Having an accurate evidence base underpins the delivery of housing growth and the soundness of DPDs. In any case, sufficiently detailed costings along with a schedule on when and who is responsible for key infrastructure is not contained within the JCSPS. It is also unclear whether agreement has been reached with third-party providers on the delivery of key pieces of infrastructure. 2.24 There is also concern that the infrastructure report was only made available to the GNIP in October 2009 less than a month before the JCPS was published and only made available to the public on 2nd November 2009. Since the GNIN&F2009 post dates the earlier

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JCS consultations and only pre dates the JCSPS by circa 4 weeks it clearly indicates to us that the pattern of growth was not informed by the preparation of this key piece of the evidence base. It appears that the GNPD are looking to justify the JCSPS retrospectively. In other words, the findings were led by the predetermined preferences of the GNPD. Joint Core Strategy for Broadland, Norwich and South Norfolk - Strategy to Accommodate Major Housing Growth in the NPA - Topic Paper (Sept 2009) (SAMHG) 2.25 The Strategy to Accommodate Major Housing Growth in the NPA Topic Paper (SAMHG) is part of a series of topic papers that seeks to explain how key aspects of the JCPS have been developed. It explains the considerations that underline the strategy to accommodate major development in the NPA and describes the considerations that have shaped it. 2.26 Page 2 of the SAMHG briefly lays out the logic behind the spatial strategy: "The first task of the spatial strategy is to distribute the development likely to be needed over the next fifteen years, but to do it in a way that respects the character of the area and offers the best prospects of delivery. In order to do this it starts by accommodating as much within the urban area as possible, and seeks to make the maximum use of previously developed land, consistent with maintaining the environmental qualities of the area. It also examines the environmental assets of the area, both within and outside the urban area. It looks at the need to promote accessibility by non car modes, including the potential offered by currently successful public transport corridors in the south west, corridors prioritised for improvement in the west and the need for a more radical approach to public transport priorities in the north east. Outside of the urban area of Norwich the resultant strategy focuses on a large-scale urban extension to the north east of the city, based around two or three centres either side of the proposed Northern Distributor Road (NDR). To the south of the city there is a more dispersed pattern of growth, focussing on utilising the Norwich fringe where possible, sustainable expansion of the market town of Wymondham and growing larger villages to encompass a wider range of services, facilities and employment opportunities." (SAMHG, p.2) 2.27 Section 6 of the SAMHG explains the evolution of the favoured option as detailed in Policy 9 of the JCPS Preferred Submission which: "involved a redistribution from Wymondham and Hethersett to the West (Costessey/Easton) and Long Stratton, the latter specifically to address the long-standing issue of a bypass for the village" (SAMHG, p. 6) The need for a new bypass at Long Stratton is a very poor 'reasoned justification' for the growth proposed at Long Stratton and goes against the principles of sustainable development and Policy NR1 of the RSS which requires a 'step change' towards sustainable transport. 2.28 This was referred to as Option 2 which resulted in part to the housing allocation at Wymondham falling from 5,000 to 2,000 despite the findings of the previous Issues and Options consultation which stated: "that a pattern of development centred on an urban extension North East of Norwich, and a new 'country town' South West of Norwich (Hethersett area) and extensions to Wymondham provided 'the better opportunities for larger-scale growth'" (SAMHG, p. 4) 2.29 Indeed, as the SAMHG notes, at the Reg 25 Technical Consultation stage: "The officer recommendation was that the evidence suggested that Option 1 should be the Favoured Option" (SAMHG, p.7) 2.30 Following a PINS Review of the pre-submission review in January 2009 (PreRJCS) concerns were raised about the evidence base used to support Option 2A, which allocates 2,200 units at Wymondham. In order to respond to these concerns a further revision was proposed and called Option 2+. Option 2+ remained the same as Option 2A but with the omission of Mangreen. Option 2+ was subsequently consulted on as the Favoured Option in the Public Consultation between March and June 2009. 2.31 The SAMHG at Appendix 2 under "Transport and Accessibility" recognises the importance of engendering a step change in increasing the use of public transport, as stipulated by the East of England Plan. The evidence on the use of Bus Rapid Transit (BRT) supports the need for higher housing allocations in the areas where it is proposed: "The East of England Plan requires the strategy to seek to achieve a step change in the share of journeys made without relying on the car. Achieving this will require a significantly more attractive public transport offer than that has been the case in the past, and the strategy seeks to achieve this by promoting bus rapid transit (BRT) to achieve attractive frequencies, reliability and journey times." (SAMHG Appendix 2) "One of the key factors in meeting the requirements of the RSS will be achieving a significant change in travel mode from car to public transport, walking and cycling. Although each of the individual growth locations in the A11 corridor is considered unlikely to be large enough to support the goal of high-quality public transport, using Bus Rapid Transit, the overall concentration of development within the A11 corridor (a total of 4,400 units) 'gives an opportunity to sustain reasonable bus services' (SA of Favoured Option, 23/04/09) in order to promote a modal shift" (SAMHG, Appendix 3 paragraph 4.1.1) Reliance on less than 4400 units at Wymondham clearly contradicts the provisions of Policy NR1 of the RSS, which seeks to engender a step change away from the use of the motor car by providing a real alternative in terms of public transport. The 2200 unit allocation at Wymondham will not achieve the benefits of BRT. 2.32 The SAMHG defends the reduced allocation of housing at Wymondham, arguing that the physical capacity is not sufficient to justify more than 2,200 dwellings. ".....there are issues relating to physical capacity of these settlements. Particularly significant is the historic fabric of Wymondham, where the impact of increasing numbers of users on the town centre may make higher levels of growth difficult to absorb. There is no doubt that 2,200 additional properties will have an impact, however the opportunities for expanding the town centre functions beyond the core Market Place are more likely to be sufficient to cope with this more moderate expansion than the doubling of the settlement proposed under earlier growth options." (SAMHG, Appendix 3 paragraph 4.2) This contradicts previous evidence, as already discussed, that establishes Wymondham as a highly sustainable location. It also misses the point that by directing further growth to Wymondham it will be possible to deliver important new services and facilities, including a new complementary district centre, a new secondary school and a high frequency BRT service. 2.33 It is apparent from the SAMHG that a logical and reasoned approach to the growth strategy has not been adopted. Despite the PreRJCS Inspector stating that the evidence base indicates that Option 1 should be adopted, a more dispersed strategy has been adopted. It is also clear that from the Inspector's comments that the justification for the more dispersed distribution of growth is weak, especially with regard to NE Norwich bypass and Long Stratton (a new bypass). The SAMHG also flags the inherent contradiction between the proposed pattern of growth and RSS Policy which seeks to realise a step change in reducing reliance on unsustainable transport modes by offering a real alternative to the car. The more dispersed pattern of growth misses the critical mass required to achieve a high frequency BRT service at Wymondham. Greater Norwich Joint Core Strategy - Public Transport Requirements of Growth (Nov 2008) (GNPT) 2.34 With respect to

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public transport and achieving enough critical mass to support expanded and improved services, Norfolk County Council commissioned Mott MacDonald to study the best performing growth options and investigate their potential to support a high quality public transport service. Four growth scenarios were initially specified for consideration in the study and are set out in the table below. Scenario Location A B C D North East (inside NDR) 5000 3750 5,000 5000 North East (outside NDR) - - - 2000 West 5000 3750 - - South West 2000 3750 5000 5000 Wymondham 3000 3750 5000 3000 Norwich 5000 5000 5000 5000 Broadland & South Norfolk fringes 3000 3000 3000 3000 Total 23,000 23,000 23,000 23,000 Table 7: Growth scenarios 2.35 The GNPT found that Scenarios C and D offer the best opportunities for developing a strong market for public transport services. It states: "The key growth locations in these options are concentrated on a South West to North East axis, creating the opportunity to implement a cross-city service at a 'turn up and go' frequency. If the growth inside and outside the NDR in Scenario D is in the form of a contiguous urban extension to Norwich, then all the developments are on a scale sufficient to support a 'turn up and go' level of service" (p.S-6) 2.36 Four further alternative options for the distribution of housing growth within the NPA were assessed using the same methodology as that for the original Scenarios A to D. Location Option 1 Option 2 Option 6 Option 6a Norwich 4000 4000 4000 4000 Broadland 2000 2000 2000 3000 South Norfolk smaller sites 2000 2000 2000 2000 North East (Sprowston/Rackheath area) 6000 6000 6000 6000 South West (Hethersett/Little Melton area) 4000 4000 South (Mangreen - Swardeston/Mulbarton area) 4500 4500 Wymondham 4000 2000 2000 West (Costessey/Easton area) 2000 2000 1000 North (St Faiths/Spixworth area) 2000 Long Stratton 2000 1500 1500 TOTAL 24,000 24,000 24,000 24,000 Table 8: Alternative Growth Options 2.37 The key findings of the analysis of the alternative growth options are summarized here: * The development of 2,000 homes in the West sector in Option 1 would not support a dedicated 'turn up and go' service operating every 10 minutes* Under Option 2, the levels of demand from the West, Wymondham and Long Stratton are all below that necessary to support a dedicated 'turn up and go' service operating every 10 minutes. These levels of demand would support dedicated services operating every 15 minutes* Under Options 6 and 6a, the level of demand from Wymondham is similar to Option 2. However, the impact of reducing the Long Stratton Housing allocation from 2,000 in Option 2 to 1,500 in Options 6 and 6a is to further reduce the level of dedicated service that can be supported to every 20 minutes* Option 6a involves further dispersion of development to smaller sites in Broadland and 1,000 houses in the West sector in place of a major growth location in the North sector under Option 6. This would be the least desirable of all the four alternative options from a public transport perspective. 2.38 It can be concluded from the above that in order to support a 'turn up and go' service Wymondham will require more than 2,200 new homes. Options C indicates that 5,000 homes at Wymondham would be the threshold amount of homes that would support a high frequency public transport service, i.e a Bus Rapid Transit (BRT). In order for housing growth to be delivered in the highest possible sustainable manner it is imperative that real alternatives to personal vehicles are provided as required by the RSS. Despite the evidence presented in the GNPT and the clearly identified need for a critical mass of 5,000 homes at Wymondham to justify a high frequency service into Norwich, the pattern of growth detailed under Policy 9 of the JCPS Document ignores the evidence presented on transport. Put simply, the proposed 2,200 homes at Wymondham will be insufficient to make viable a high frequency service and will detract from the long term sustainability of the area. This would contradict RSS Policy NR1 and Objectives 1 and 7 of the JCSPS. Stage 8 Strategic Housing Land Availability Assessment (Sept 2009) (Stage 8 SHLAA) 2.39 In summary, the Stage 8 SHLAA finds that water supply and waste water disposal is the greatest constraint on development within the GNDP as a whole. In particular: "there are water quality constraints in Long Stratton which may mean that achievable development levels are significantly below that which would be indicated in this assessment." (Stage 8 SHLAA, Para 4.16) 2.40 The following conclusions are drawn by the Stage 8 SHLAA. Comparing the JCPS favoured option trajectory for the NPA and the constrained trajectory three things become clear. First, that the availability of water supply constrains the delivery of housing below JCPS expectations in the period 2015 to 2019. Second, that the constrained capacity within the period 2020 to 2024 exceeds the JCPS expectations and finally that the estimated upper limit of the anticipated volumetric discharge consent for Whitlingham is, allowing for rounding, very close to or at the necessary development levels required to meet the JCPS favoured option for development. 2.41 Overall, the Stage 8 SHLAA seeks to support the conclusion that there is sufficient available and developable land, which is in the right locations, to meet the JCPS targets. The major constraints to development in the long term will be water supply and waste water disposal and post 2026 JCSPS targets begin to impinge upon expected upper levels constraints in waste water disposal. 2.42 Given that the Stage 8 SHLAA was published after the Reg 25 Technical (Aug 2008); Reg 25 Public Consultation (March 2009) and less than one month prior to the publication of the JCSPS (Nov 2009) the favoured growth option could not have been justified or supported by the SHLAA. In effect, the SHLAA seeks to justify the growth strategy retrospectively which raises concerns over the soundness of the plan. Pre Submission Review of JCS by Planning Inspector (Jan/Feb 2009) (PreRJCS) 2.43 The Planning Inspector conducted a pre-submission examination of the Core Strategy in Jan/Feb 2009 in order to flag any questions that appear potentially contentious or problematic and to identify matters that the GNDP should think about more clearly. The Pre Submission Review of the JCS (PreRJCS) is summarised here. 2.44 In Paragraph 9 of the PreRJCS the Planning Inspector makes it clear that: "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." (PreRJCS, Para 9) 2.45 The Inspector highlights the importance of the Infrastructure Needs and Funding Study (GNIN&F2007) which was completed in 2007 and which has since been superseded by GNIN&F2009: "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." (PreRJCS, Para 14) 2.46 The lack of information on when, during the plan period, crucial components of infrastructure are expected to be implemented and evidence that infrastructure providers agree that there is a reasonable prospect of the infrastructure being delivered at the appropriate time is a key

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concern. As noted in these representations, Policy 20 of the JCSPS on Implementation does not provide any kind of detailed Delivery Plan which specifies who will provide key infrastructure and when it will be provided. This view was shared by the Inspector in the PreRJCS: "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?" (PreRJCS, Para 15)2.47 The information contained in Appendix 8 of the JCSPS is too general in terms of phasing and costs. There is no clear timeline linking proposed development and infrastructure on which sites are dependent. It also does not provide sufficient clarity on whether agreement has been achieved with third-party providers of infrastructure. These matters are fundamental (even more fundamental in the case of those developments coming forward earlier in the plan) to delivery, as highlighted in the Inspector's comments above.2.48 Paragraph 19 draws attention to the need to provide a clear audit trail for the alternatives considered for Norwich and Broadland and the reasons for decisions made. With regard to the three options for South Norfolk, the Inspector finds that a comprehensive analysis has been prepared, however, the further option, described as Option 2a, is lacking in information and therefore suggests that further work should be carried out: "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." (PreRJCS, Para 20)2.49 The Inspector also draws attention to a lack of clarity over how Option 2a relates to national or regional policies or the vision and strategy set out in the Reg 25 Consultation document. "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?" (PreRJCS, Para 21)2.50 The Inspector continues, stating that: "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 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." (PreRJCS, Para 22)2.51 The Inspector finds that overall: "Further work would need to be carried out on option 2a, particularly in relation to the sustainability appraisal; deliverability; and its relationship to the overall vision and strategy, and general conformity with the RSS. You will need to consider the extent to which consultation undertaken for options 1, 2 and 3 can adequately inform the evaluation of option 2a, and undertake further consultation if necessary. Such consultation should be proportionate to the task." (PreRJCS, Para 24)2.52 The review of the PreRJCS draws attention to the importance of preparing key evidence prior to the submission of the JCPS. Given the Inspector's comments on the 'fundamental' nature of the GNIN&F2009 to ensuring that the JCPS can meet the 'effectiveness' test of soundness, it is concerning that it was only published less than 4 weeks prior to the release of the JCPS. It also post-dates the earlier JCS consultations and has not therefore usefully informed the proposed growth strategy. In short, the GNIN&F2009 seeks to justify retrospectively the plan.2.53 Despite the attention drawn by the Inspector to the importance of preparing a detailed delivery plan, identifying when critical infrastructure will come forward and whether agreement has been reached on who will provide it, the information contained in Appendix 8 of the JCSPS is clearly lacking.2.54 Our previous comments with regard to the Norwich Common Appeal decision negates one of the key principles flagged by the Inspector for resisting greater growth at Wymondham, namely a supposed need to preserve Strategic Gaps. Put simply, the Norwich Common Appeal decision concluded that no Strategic Gap exists between Hethersett and North East Wymondham which would preclude a greater allocation of housing growth at Wymondham.2.55 We agree with the Inspector that there is a lack of information to inform the proposed pattern of growth and therefore further work needs to be undertaken, especially in respect of deliverability and general conformity with the RSS. Wymondham as highly sustainable location2.56 Wymondham is widely recognised in the evidence base as being one of the most sustainable locations for growth within the NPA, yet, despite this, the level of growth envisioned under Policy 9 of the JCSPS does not reflect the fact that Wymondham can readily accommodate more than 2,200 new additional homes.

2.57 This section reviews the JCS Sustainability Appraisal Framework (Draft) (April 2009) (JCSSAF) which is one of the key evidence base documents and acts as a useful summary establishing Wymondham as a highly sustainable location. It highlights, again, the lack of consistency between the findings of the evidence base and the chosen distribution of growth. Greater Norwich Development Partnership Joint Core Strategy Sustainability Appraisal Framework (Draft) (April 2009) (JCSSAF)2.58 This document was originally prepared to accompany the preferred option of the joint core strategy under the pre-June 2008 planning-making procedures. The JCSSAF has been updated to incorporate the three original growth options for the Norwich Policy Area, that were included in the July 2008 Regulation 25 JCS Technical Consultation (JCSReg25.2008). It also now includes an appraisal of the favoured growth option as agreed by the GNDP in February 2009.2.59 With regard to Wymondham as a growth location, the JCSSAF states: "Although some distance from Norwich, good locally accessible services and opportunities for high quality public transport moderate impact of transport on the environment. There are localised areas of environmental quality, but no large scale environmental constraints which would make the location unsuitable in environmental terms.

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The underlying ground conditions mean that effective SUDS might require some attenuation, but this may also offer potential for enhancement of the water environment." (JCSSAF, p.319)2.60 The JCSSAF recognises Wymondham as a highly sustainable location with access to a wide range of existing services and facilities:"Development at Wymondham would have good access to a range of local facilities and job opportunities. Wymondham already has a strong established community which should assist the establishment of community spirit in the new development, making this one of the better locations in this respect. Of all the locations under consideration, it has the widest range of town centre uses outside Norwich." (JCSSAF, p.319)2.61 Furthermore, the JCSSAF highlights the existing employment provision and potential for further employment growth, especially given its strong strategic links to Norwich and Cambridge:"Wymondham is further from the range of job opportunities at Norwich than many alternative locations, but is a well established employment location in its own right which has already demonstrated its ability to attract employment investment. The town also enjoys good strategic links by train to Norwich and Cambridge widening employment opportunities which are readily accessible. Of all the locations under consideration, it has the widest range of town centre uses outside Norwich." (JCSSAF, p. 319)2.62 In terms of existing infrastructure, the JCSSAF finds that:"Good local facilities and public transport options will moderate car impact. Good opportunities to expand high quality public transport. Wymondham benefits from a rail connection on the Norwich - Cambridge line, which also serves another major growth area at Thetford. Subject to being able to overcome the challenge of the Thickethorn Junction with the A47, it is served by the best performing public transport corridor within the urban area of Norwich. The presence of a town centre with a number of facilities, and local employment opportunities, should help to reduce the length of some journeys, mitigating against Wymondham's location some distance from Norwich...Overall, it is one of the better performing locations." (JCSSAF, p.313) [emphasised BWP emphasis]2.63 In terms of future growth, the JCSSAF emphasizes the benefits of achieving a higher allocation in order to secure new services and facilities. With respect to the JCSReg25.2008 Option 1, which allocates 4,000 homes at Wymondham, the JCSSAF states that:"Locating growth in combination in NE and SW/Wymondham (sic: for clarity this should read 'NE Norwich and SW of Norwich and Wymondham') provides enhanced ability for high quality public transport and co-location of housing and employment. The policy includes strong references to self-containment; walking and cycling and bus and rail use, which clearly need to be in place for such growth. (Policy could be improved by more specific reference to public transport linkages across the city in a SW-NE direction linking the suggested growth locations through the city centre)" (JCSSAF, p. 150)2.64 Conversely, low thresholds of new housing fall short of delivering important new infrastructure, as highlighted in the JCSSAF, which finds that under the JCSReg25.2008 Option 2, which allocates 2,000 homes at Wymondham:"The education solution for Wymondham at this level of growth causes high school capacity problems." (JCSSAF, p.167)This is because the 2,000 homes would be inadequate to justify a new secondary school (threshold of 6,000)2.65 Another problem with the lower allocation of homes at Wymondham under Option 2 is the fact that improved bus services will not be delivered:"Smaller scale major growth locations less likely to support bus services and local services. Education solution for Wymondham less than ideal." (JCSSAF, p. 170)2.66 Indeed, with respect to education the JCSSAF concludes that under Option 2: "Education solutions for high schools in Long Stratton and Wymondham are compromised." (JCSSAF, p. 173)2.67 The above clearly identifies Wymondham as a highly sustainable location with excellent access to jobs and existing services and facilities, which could accommodate higher levels of growth. Furthermore, it recognises the benefits of a higher allocation of growth in terms of securing a new secondary school and public transport provision.Delivering a Critical Mass of Homes to Secure New Community Facilities2.68 A detailed literature review of the guidance on infrastructure thresholds was undertaken in order to inform the appropriate level of housing growth in sustainable locations, such as Wymondham (Appendix 4).2.69 Table 9 below summarises the findings of the literature review. Facilities

Number of units	Facilities
1,000 - 5,000	Primary School
1,000 - 1,200	Doctor's surgery
800 - 2,000	Corner shop
2,000 - 4,000	Group of shops
2,000 - 4,000	Post Offices
2,000 - 5,000	Small local park
2,800 - 6,000	Community centre
4,000 - 6,000	Frequent bus services
3,600 - 4,800	Healthcare centre
4,800 - 12,000	Library
15,000 - 25,000	Public sports facilities
5,000 - 6,000	BRT (high frequency)
6,000 plus	Secondary school

plus Table 9: Summary of housing thresholds for infrastructure2.70 By allocating circa 6,500 new homes at Wymondham it will be possible to achieve the necessary critical mass in order to deliver a much needed new secondary school and a high frequency BRT service in addition to a host of other new services detailed in the enclosed masterplan document (Strategic Site Release Document) located in Appendix 6. In applying a more concentrated pattern of growth, the JCPS will be better placed to deliver on Objectives 1, 2, 5, 6 and 7 and also the RSS policy requirement to engender a step change away from the use of unsustainable modes of transport.

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Respondent: University of East Anglia (Mr Roger Bond) [3868] Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text:

Summary:

The University of East Anglia (UEA) considers Policy 9 to be unsound because it fails the Justified soundness test. However, the UEA considers that the failure is not fundamental to the general intent of the policy and can be put right with non-substantive wording and graphical changes, to include specific reference to improvement to public transport to and within the Norwich Research Park. Main Representation Whilst the UEA supports Policy 9's acknowledgement that there will be a significant expansion of higher education, health and science park activity at the UEA/NRP, it objects to the Policy's references to proposed bus improvements as illustrated on the NATS - Proposed Implementation Plan on Page 61 of the submission document. This effectively appears to leave UEA at the end of a tortuous cul-de-sac with respect to bus routeing. The UEA contends that this would appear illogical given that the University is one of the major bus interchanges in the City, operates a renowned travel plan that is dependant on bus availability, and has ever growing links with the Norwich Research Park and the Norfolk and Norwich University Hospital. The UEA has already lodged an objection to the Norwich Area Transportation Strategy, which would have supported the creation of a 'green spine' route from the City through the golden triangle area and then via the Avenues to UEA and the NRP/NUH area beyond. The UEA considers that to not include a complete route, linking the UEA and the rest of the NRP with the City Centre and other areas is a missed opportunity to create a high quality public transport link to between important public transport interchanges, with the potential to avoid heavily trafficked routes that currently blight exiting bus travel. It therefore is not the most appropriate strategy when considered against the reasonable alternatives and fails the Justified soundness test. The UEA notes that elsewhere in the JCS (Appendix 7 - Implementation Framework), mention is made of a bus priority route via Hethersett Lane/Hospital/NRP/UEA/City Centre. This link needs to be properly reflected in Policy 9 and the NATS illustration on page 61. Suggested change Policy 9 and the NATS Implementation Plan on page 61 need to be changed to include a more specific reference to the UEA as being part of a key public transport route linking Wymondham/Hethersett through the NRP and into Norwich.

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Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary:

The dependence of the JCS on the NDR is unsound because:- The JCS fails to demonstrate whether a NDR is the best available means of delivering growth. Land for a new urban extension and eco-town in NE Norwich and employment at Postwick could be unlocked by developing public transport and rail links and lower cost road infrastructure.- A NNDR would jeopardize a sustainable transport and land use strategy for Norwich by increasing car dependence, consuming a large amount of public funds for road building and increasing CO2 emissions.- A NNDR isn't a good spatial fit. Housing growth in north-east Norwich astride a NNDR is poorly related to strategic employment sites. A NNDR would facilitate car commuting between housing in the north-east and strategic employment sites in the south-west of the city (Colney Research Park and the Norfolk and Norwich University Hospital), to the west (Longwater Retail and Business Park) and to the east (Broadland Business Park). The developers of Rackheath eco-town have stated that employment for residents would be partially provided by Broadland Business Park. NNTAG overall is very concerned about the level of growth on out of town sites, the impact on travel patterns and carbon emissions, on social inclusion and transport and on City centre viability. In particular we object to two employment development proposals which we believe to be unsound:- 30ha new business park at the Airport to be focused on uses benefiting from an airport location. However NNTAG considers that a large area of land in open countryside opened up by a NDR is not justifiable. Norwich Airport is small and passenger numbers have fallen steeply. Demand for space for businesses genuinely related to airport use has not been demonstrated. The proposal for a business park at the Airport is a key driver behind the NDR. 'The Economic Impacts of the NDR' (Roger Tym, 2005) concluded that the NDR would have only a limited effect on widening the airport catchment area which currently predominantly attracts passengers from Norfolk and Norwich.- Extension to Broadland Business Park of around 25ha. Land would be in addition to Phases 1 and 2. In the event of an urban extension to north-east Norwich going ahead, NNTAG considers that it would be better to locate new employment land in close proximity at Sprowston/Rackheath in order to reduce the need to travel. Under the JCS proposals, linking strategic housing in north-east Norwich with further expansion of strategic employment at Postwick via a NDR would encourage trips between the two locations by car. The JCS has not demonstrated the need for further expansion at Broadland Business Park.

Joint Core Strategy Proposed submission Document

O - 11404 - 7172 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11404 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary: Sustainability Appraisal Not compliant. Although the SA highlights that major growth located close to a NDR could result in environmental impacts such as car-based trips, the SA does not consider alternative transport options which would avoid or reduce adverse impacts as required by the SEA Directive. The SA has treated the unsustainable NDR as part of the baseline case and not as an option. Responding to public criticism on this traffic-generating impact of the NDR, the SA Report asserts: "The NDR may encourage car-based trips", but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of the road by residents of the Growth Area. However, the NDR Major Scheme Business Case (July 2008) shows high traffic growth on a number of road links across the Norwich Area as a result of the NDR Preferred Option, with substantial growth on radial roads in north-east Norwich and an increase in carbon dioxide emissions compared to Do-Minimum. Norfolk County Council has programmed construction of the NDR in 2014-15, whilst sustainable transport measures, including a bus rapid transit system, are not programmed for completion until 2025. There is a strong danger that people will get into the habit of using their cars if a NDR goes ahead. Local experience has shown the difficulty of transferring orbital car-based journeys to sustainable modes.

Joint Core Strategy Proposed submission Document

O - 11415 - 7172 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11415 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary:

Not legally compliant with RSS Norwich Policy NR1 which seeks to: 'achieve a major shift in emphasis across the Norwich Policy Area towards travel by public transport, cycling and walking.' Policy NR1 must also be read alongside wider RSS policies to reduce the region's impact on climate change by locating development so as to reduce the need to travel and effect a major shift in travel away from car use towards public transport, walking and cycling. The GNDP claims that a NDR is in conformity with the RSS because RSS Policy Norwich NR1 refers to 'having regard to the Norwich Area Transportation Study (NATS), which provides a strategy for improving access by all modes of transport across the Norwich Policy Area' and NDR is a key element of NATS. At the time of the RSS EiP in 2005, the NDR project in the Draft East of England Plan was a full orbital route to the north of Norwich, approved as part of NATS in 2005. Norfolk County Council dropped the western section over the River Wensum SSSI/SAC shortly before the EiP and the NDR became a three-quarters road. Depending on the outcome of the Minister's decision on Programme Entry, the NDR could be further reduced in length. The Eastern Daily Press on 11 December 2009 reported that DfT civil servants are recommending Programme Entry for a NDR between A47 Postwick Interchange and A140, but not west of the A140. If accepted, a half route NDR would largely function as a development road for north-east Norwich and not as a full or three-quarters distributor road for north Norwich. Also, the NATS would no longer be predicated on a NDR. In such circumstances, a NDR would not be in conformity with the RSS Policy NR1 as the purpose of the NDR/NATS approved by Norfolk County Council in 2005 would have changed considerably.

Joint Core Strategy Proposed submission Document

O - 11418 - 905 - Policy 9: Strategy for growth in the Norwich Policy Area - iii

11418 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: policy 9 Strategy for growth in the Norwich Policy Area
The Housing numbers given for individual settlements have been considered in the SA/SEA report for their likely environmental impact, incl the impact on the historic environment. Many of these settlements have limited capacity for major additional development due to their historic sensitivity. We do not consider it appropriate, therefore, to incl the ref to these numbers being minima.

Joint Core Strategy Proposed submission Document

O - 11419 - 905 - Policy 9: Strategy for growth in the Norwich Policy Area - iii

11419 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 9 Supporting textpara 6.4 should refer to policy ENV6 of the East of England Plan, which refers to the importance of Norwich as a historic city.

Joint Core Strategy Proposed submission Document

S - 11441 - 8586 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11441 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: RG Carter Farms and Drayton Farms Ltd (Mr Nigel Handley) [8586] **Agent:** Bidwells Norwich (309) (Mr Darren Cogman) [4024]

Full Text:

Summary: We wish to offer qualified support to the identification of 2,000 residential dwellings to be accommodated within smaller sites within Broadland (in the Norwich Policy Area) (Policy 9). We can confirm that the site promoted at Reepham Road in Hellesdon (Parish of Horsford) is suitable and available for development and capable of contributing approximately 300 dwellings (at 30dph) to the policy's requirement to accommodate at least 2,000 dwellings. We welcome the supporting text to Policy 9 that identifies new allocations to deliver a minimum number of dwellings in accordance with the advice contained within the Regional Spatial Strategy (Policy H1); namely, that dwelling numbers should not be expressed as a ceiling which should not be exceeded, rather as a minimum target to be achieved.

Joint Core Strategy Proposed submission Document

O - 11443 - 8586 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11443 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: **RG Carter Farms and Drayton Farms Ltd (Mr Nigel Handley) [8586]** Agent: **Bidwells Norwich (309) (Mr Darren Cogman) [4024]**

Full Text:

Summary: R G Carter Farms Ltd. considers the Employment Development element of Policy 9 to be unsound because it fails the Justified soundness test. Whilst R G Carter Farms Ltd. welcomes employment development at locations within/adjacent to northern Norwich, and is supportive of the approach to invest in strategic and other employment locations by allocating sufficient land, it is concerned that sustainability linkages with residential populations have not been adequately explored. The R G Carter Farms Ltd. land is located at the junction of Reepham Road with School Road in close proximity to Thorpe Marriott as well as Drayton and Taverham. Given that Thorpe Marriott has no existing employment provision the host land offers opportunities to minimise commuting, and accordingly the opportunity to build a sustainable community. As such R G Carter Farms Ltd. contend that Policy 9 (Employment) is not 'Justified' given that it is not the most appropriate strategy when considered against the reasonable alternatives.

Joint Core Strategy Proposed submission Document

O - 11444 - 1797 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11444 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: **Great & Little Plumstead Parish Council (Mr I Bishop) [1797]** Agent: **N/A**

Full Text:

Summary:

After careful thought and consideration we believe these proposals are unsound and there are far better alternatives available, which are much more suitable to meet the needs for housing, road infrastructure, sustainable employment and prosperity for the longer term with regard to Norwich and Norfolk, rather than through the allocation of Major housing along the line of the proposed NNDR, in order to fund the construction of the road. We would agree with the principles put forward in the GNDP summer update 2008 and quoting your words: "What we are working to achieve, local people will". - "Live in a distinctive place, whether part of the historic city, suburbs or fringe parishes, a market town, village or countryside. - Trust that the special character of the countryside, natural, built and historic environment will be valued, protected, managed and enhanced, with people proud of where they live, work, study or visit. - Live a more environmentally friendly way of life in communities, which have efficiently managed water, energy and water removal. - Have access to a wider variety of services and facilities, better health and high value, fulfilling jobs based on enhanced education and skills, increased prosperity and reduced deprivation in urban and rural areas. - Enjoy high quality surroundings in high standard homes, with support and care if needed, at a price they can afford. - Know that existing and new development will create communities, which are sustainable, foster pride and a sense of belongings." Unfortunately, the current proposals do not reflect or deliver any of these aspirations listed above. We agree with the wording that "the fundamental question is the establishment of principles" However, we think these principles should include the concept of saving, preserving and enhancing existing villages, markets towns and their communities within the County of Norfolk and in this respect, the consultation documentation is lacking. At the centre of the proposed Joint Core Strategy is that Norwich will be the centre of activity and employment. One of the outputs of this strategy is the Norwich Area Transport Strategy (NATS) its principles objective to transport people to and from Norwich. Again, an output of this is a massive carbon footprint, pollution in the form of carcinogenic fumes, increased noise and congestion. A further example of this can be observed with the current park and ride at the A47 Postwick junction, 70% of traffic, currently using it is from the coastal area, at the same time there are business parks empty in the area they are coming from. The JCS housing proposals are fundamentally unsound as these allocations are totally reliant on the construction of the proposed NNDR. A decision on whether the road will even be funded by central Government will not be made until 17th December 2009. Without the NNDR, the GNDP has accepted the allocations cannot proceed. The proposed NNDR will not decrease traffic; on the contrary, it will significantly increase traffic for Norwich and Norfolk. An integral part of the NNDR plans are the proposed closure of Smee Lane, Low Road and Middle Road, again the closure of these feeder roads will result in the funnelling of traffic on to the Plumstead Road, Salhouse Road, and Thorpe Road causing even more congestion. No provision is made in the NATS or the JCS for the urgently required link road from the C874 Plumstead Road to the Postwick roundabout. This should have been implemented by now and be in place, as it was an integral part and requirement of the planning consent for the current business park. Consequently, traffic is increasing on a daily basis on Green Lane north with all the associated environmental pollution and severe blighting of residential property. Norfolk has to be a classic case for intervention, given that its growing industry is largely agriculture and tourism and as for commercial, financial and administrative employments, these are increasingly being enabled by people to operate from home because of advances in telecommunications and the World Wide Web internet. Progressive growth along with housing can equally be achieved by controlled enlargement of existing villages throughout Norfolk, Acle, North Walsham, Holt, Diss, Wymondham and Attleborough, Hethersett and others providing Local employment with minimum travel requirements and resulting carbon footprint. Norwich and Norfolk benefits from high value employment such as John Innes Institute, UEA, Lotus engineering. NNH Trust. However, it does not have to be centred on Norwich. Where high value/high Tec industry/employment such as exist in Cambridge, now this should be attracted and centred South of Norwich close to the A11. With the increasing need to urgently reduce CO2 emissions for health and environmental reasons which are linked with commuting between housing and employment the JCS should have set out sustainable housing and employment proposals to significantly reduce the need for all travel use, not be centred on the need to fund the NNDR which will only generate more car/vehicle movements use and increase CO2 emissions. That is why we believe the major growth areas should be along the A11 corridor, which has existing, excellent road infrastructure and rail facilities, which can be upgraded in a much more cost effective way than building the Rackheath eco Town in Broadland, east of Norwich and the proposed NNDR.

Joint Core Strategy Proposed submission Document

S - 11447 - 2644 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11447 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Wrenbridge (Harts farm Ltd) (The Manager) [2644] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary: Wrenbridge (Harts Farm) Ltd supports Policy 9's requirement to allocate 15ha of additional employment land at Wymondham. Wrenbridge suggests that the policy could be made more specific by indicating the general location of the new allocation. Wrenbridge contends that sufficient information has been submitted to the GNDP demonstrating a deliverable employment allocation to the east of Wymondham. Wrenbridge confirms that the land promoted to the east of Wymondham is capable of providing 15 hectares of general employment land. This would provide the necessary spatial framework for the allocation of the land in the site specific allocations DPD and a strategic context for determining planning proposals.

Joint Core Strategy Proposed submission Document

O - 11452 - 8513 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11452 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: No mention made of the warnings by Defra and the John Innes Institute that with Global warming now beginning to bite we need to preserve all our valuable food producing farm land.

Joint Core Strategy Proposed submission Document

O - 11455 - 8513 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11455 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: Why has the NE Triangle been selected for the majority of the building in the GNDP area when it has the worst infrastructure, roads, water, sewage, drainage and power supplies. Why not build on the A11 corridor from the N&N which has much better facilities. The Ecotown at Rackheath is in the totally wrong place. Why not use the Golf Course site at Hellesdon which has good road access and infrastructure.

Joint Core Strategy Proposed submission Document

S - 11479 - 8224 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11479 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Barratt Strategic/Manor Farm Rackheath [8224]

Agent: CGMS Ltd (Mr Richard Atkinson) [7681]

Full Text:

Summary:

I refer to the pre-submission document for the Joint Core Strategy for Broadland, Norwich and South Norfolk which was released for public consultation on 2nd November. This representation, in support of the Joint Core Strategy, is submitted on behalf of the promoters of Rackheath Eco-Community - Barratt Strategic and Building Partnerships Ltd. We are pleased to note that the document is generally supportive of the Rackheath Eco-community and its policies are consistent with the objectives of the Rackheath Eco-community and are generally consistent with the Eco-towns submission to DCLG. We would not wish to take issue with the legality of the process and consider that the document provides a robust assessment of the evidence base and has responded positively to previous rounds of consultation. The overall approach of preparing a Joint Core Strategy is supported. The joint working of the councils in the Norwich Policy Area provides a comprehensive approach based on a single database of information. It results in a coherent strategy that paves the way for site specific work that all councils can take forward in similar timescales. This approach is a refreshing change and contrasts with the approach being adopted in other parts of the region. The Northern Distributor Road We support the approach to transport planning which includes a proposed Northern Distributor Road (NDR). Whilst the strategy relies on a favourable decision on the funding for the Northern Distributor Road it is the most practical way to create capacity and to provide a modal shift to Rapid Bus Transit (RBT) in Norwich. We therefore agree with the statement set out on page 7 which states that " Significant improvement to the bus, cycling and walking networks in Norwich can only be achieved with the road capacity released by the NDR which also provides necessary access to key strategic employment and growth locations." As far as the Eco-Community is concerned, travel planning is predicated on extensive provision of public transport (including the new rail station, high quality bus transit and walking and cycling routes). The implementation of the Northern Distributor Road would clearly also deliver benefits to the Growth Triangle in terms of its general accessibility, however over-reliance upon private vehicle movements would be actively discouraged in the Eco-Community where the emphasis is on maximising non-car use for all trips. This position on Rackheath is consistent with the DCLG statement, in selecting the site as an Eco-town, that " the proposed NDR has yet to receive DfT major scheme approval, although consideration of the scheme is well advanced, but alternative means of improving road access to Rackheath are also achievable". It is understood that a decision on funding is expected from the Department for Transport on 15th December, one day after representations have to be made to the Joint Core Strategy, and we trust that a positive outcome will be received. In the event that this decision is unfavourable, the promoters of the Rackheath Eco-Community will work with GNPD and other key stakeholders to ensure that an alternative strategy is quickly brought forward which would support delivery of the Eco-Community. Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle On page 22, the Spatial Vision refers to growth being focussed "on brown field land and in a very large mixed use urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle." Appendix 5 defines this area as including the whole of the Eco-community with the exception of land to the north of Stonehouse Road, as well as land within the NDR. This is not considered to be a material issue as the current masterplan shows the area north of Stonehouse Road retained as open land. We note that the growth triangle does not include land east of the railway in the vicinity of Rackheath. While not relevant to the current consultation, it would be prudent for this area to be considered in any future revision to the strategy in the light of enhanced growth forecasts which are expected to emerge from the review of the Regional Spatial Strategy to 2031. The current strategy allows for 2000 houses per year 2021-2026 whereas the scenarios in the Regional Spatial Strategy review range from 2170 to 2400 per year for the Greater Norwich area. Policy 9 allows for 7,000 dwellings in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle by 2026 rising to around 10,000 "eventually". Policy 10 sets out the key parameters for the area. While not disputing the soundness of the plan, we would suggest that the wording on housing numbers could provide clarification that, of the 10,000 proposed, "a minimum of 4,000 dwellings should be provided in a new settlement at Rackheath".

This would be consistent with the proposals for the Eco-Community submitted to, and accepted by DCLG in determining that Rackheath should be cited in the Eco-towns Planning Policy Statement (Supplement to PPS1). Similarly it could be clarified that the district centre referenced in Policy 10 and the secondary school and household waste recycling centre should be at Rackheath.

Joint Core Strategy Proposed submission Document

O - 11481 - 6783 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11481 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr Ian Corsie [6783]

Agent: N/A

Full Text:

Summary:

almost every element of the strategy is flawed, and in total it will do a great deal of damage to the north east area of Norwich, without making the best use of existing possibilities and lines of communication elsewhere. The scale of the development is unsustainable because of:-a) overall, the detrimental effect it will have on the setting and landscapes of the Broads National Parkb) Rackheath: the undeliverable nature of the huge, and hugely expensive infrastructure which would be needed to create a genuine ecotown rather than the opportunistic building of thousands of cramped high density houses to an inevitably penny pinching budgetc) the selection of sites, like Rackheath, which shows no regard to the spacing of settlements in a planned and sensitive way befitting the Broadland area.d) the transport aspirations which are pie in the sky. The movements of the total of the existing and any new population will be heavily car dependent. Public transport can make only a partial contribution to the whole. The existing road network is completely inadequate for present day needs, even less so for an expanded population. Walking and cycling in safety is practically impossible within the whole area covered by the strategy. Roads such as the A1151 are already at or above sensible operating capacity and it is clear that no thought has been given to the consequences of the inevitable high levels of traffic growth.e) the NDR, which is needed to deal with existing problems, not to be used as an excuse to develop open country.

Joint Core Strategy Proposed submission Document

S - 11485 - 8218 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11485 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Wymondham Consortium of Landowners [8218] **Agent:** Bidwells Norwich (309) (Mr Rob Snowling) [8381]

Full Text:

Summary: Bidwells, on behalf of Wymondham Consortium of landowners, supports the proposed allocation of 2,200 dwellings at Wymondham. We consider that the identification of Wymondham as a location for growth within the Norwich Policy Area (NPA) under policy 9 of the proposed submission Joint Core Strategy for Broadland, Norwich and South Norfolk is: founded on a robust and credible evidence base; The most appropriate Strategy when considered against the reasonable alternatives; and Deliverable with identified delivery patterns. In short we consider that the identification of Wymondham as a location for growth within the NPA and the allocation of 2,200 dwellings to Wymondham is Justified and Effective. We also consider that the proposed direction of at least 2,200 dwellings to Wymondham is CONSISTENT with national policy. Wymondham South is promoted as a strategic housing site by Bidwells on behalf of the Wymondham Consortium of landowners and is fully committed to delivery of the site which has undergone various technical studies to demonstrate that it is capable of delivering a significant proportion of the 2,200 dwellings in policy 9.

Joint Core Strategy Proposed submission Document

O - 11499 - 8590 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11499 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Messrs G & P Hunt & Ketteringham [8590]

Agent: Waterfront (Mr Robert Delafield) [7828]

Full Text:

Summary:

During the summer of 2009, following the publication of the agreed route for the Northern Distributor Road, it has become increasingly clear that the appropriateness of the site for this use has increased. As a result a number of amendments to the master plan have taken place, copy attached. Our comments on the proposed Submission Core Strategy document in respect to the site are set out in the attached report and on the requisite Representation Forms. These comments principally relate where major growth is preferred to be seen and supporting text. These representations have been prepared by development consultants. Our clients are currently developing plans for the redevelopment of a 10.02 ha (24.76 acres) site with access off Fakenham Road, Taverham. The site includes land and residential property together with agricultural land. The proposed development includes the majority of the site some 5.74 ha being managed as parkland and open space with residential development on land to the south comprising 4.28 ha (10.57 acres). Assuming standard densities and gross/net deductions for roads etc the likely number of homes is not likely to exceed 100. Policy 4 seeks to ensure that development is focused within the existing urban area.

"Where green field development is unavoidable it will be guided to areas with good access to Norwich, to a range of strategic employment location and services and where good transport links exist or can be provided. The locations for growth are Norwich, Old Catton, Sprowston, Rackheath, Thorpe-St-Andrew, Easton/Costessey, Cringleford, Hethersett, Wymondham and Long Stratton, together with developments on smaller sites, in sustainable locations elsewhere in the Norwich Policy Area. Each one will be a distinctive high quality sustainable community with a vibrant and attractive district centre and a network of local centres serving existing neighbourhood communities and new residents alike providing shops, health, education and community services easily accessible by foot, bicycle and public transport". The policy should be explicit in identifying residential sites within the Broadland NPA that are likely to be acceptable as a result of GNDP's focus on growth and development. A simple list of all parishes (appendix 4) within the NPA is not consistent with identifying a hierarchy of settlements where growth should be encouraged. The policy identifies new communities such as Rackheath as well as other settlements within a 9,000 dwellings total. The remaining 2,000 dwellings however are unspecified. No consideration has been given to Taverham and the appropriateness of this settlement to accommodate growth. Full and proper regards needs to be given to the impact the Northern Distributor Road will have on Taverham which will define the northern and western edges of the settlement. With the exception of Rackheath it seems likely that Taverham will be most likely to benefit as a result of the NDR. Taverham's ability to take up some of the identified growth needs to be considered in light of the following:- A sustainable community a district centre providing all of the necessary services and facilities (subject to a food store) together with a range of employment opportunities close to new residential developments.- Ease of access between Taverham and northern fringes, market towns and coast, including a bus rapid transit network stop within walking distance of residential sites.- Minimal negative impact of residential use on green field land since the NDR will in any case adversely affect existing agricultural purposes. The inclusion of open spaces, wildlife habitat and parkland will establish a buffer between open landscape and residential communities.- The change in status of the existing Fakenham Road between Fir Covert Road and was up to the link onto the NDR (single carriageway). This will become effectively access only and is ideal for safe residential access/egress.- Capacity within schools (e.g. High School expansion plans) linked by cycle ways and footpaths.- Electricity/gas availability and water/drainage (SUDS) capacity.- Ease of assimilation of 100 homes into an established residential population of circa 12,000. Our clients welcome the production of the JCS submission document and we are keen to engage positively with the process in light of the interests at this important location. We are of the opinion that our client's site is consistent with all of the key spatial objectives within the Policy. This represents a significant residential development opportunity which is available and deliverable. We have established that this provides a welcome opportunity to contribute towards the overall deliver target set by GNDP and Broadland District Council. The land in question will be effectively "blighted" as a result of the NDR for continued use for agricultural purposes. We have also established that when taken alongside proposals for land near and on Taverham Nursery Centre this site will be only a short walk/cycle away from a district centre providing a wide range of new community services alongside existing shops, vets, playgroup, café and other uses. The inclusion of bus rapid transit facilities makes this location a sustainable and attractive one for residential development of the type envisaged. As such it meets all of the criteria laid out in the submission document. We are also confident that when we engage in further discussions with the Highway Authorities they will confirm that the status of the existing Fakenham Road will change as a result of the NDR and that this will become essential residents only. As indicated above we believe that Taverham as a key settlement should be specifically identified as being an appropriate location to help provide new homes. We have also suggested the steps we feel the GNDP needs to take to include this site and others in the area, so that the policy is legally compliant and sound. See attached appendix map.

Joint Core Strategy Proposed submission Document

O - 11504 - 8057 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11504 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Policy 9 Strategy for growth in the Norwich Policy area / and Policy 6 -- COMMENTThe highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11505 - 8057 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11505 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

Policy 9 Para 6.11 Broadland Business ParkThe highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

S - 11531 - 8591 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11531 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

Policy NR1 and paragraph 13.68 of the East of England Plan refer to the development requirements associated with the Norwich Policy Area. Accordingly, we agree with the observation at paragraph 6.1 of the PSD that the EEP identifies a wider NPA to accommodate growth related to Norwich. Appendix 4 of the PSD identifies the geographic extent of the NPA and we would observe that Long Stratton clearly is included within the Norwich Policy Area. The PSD recognises that it is not possible to accommodate all the anticipated development within or at the very edge of Norwich. Accordingly, "well located and serviced settlements" within the NPA are identified to accommodate significant growth. We support the inclusion of Long Stratton in policy 9 as one of the key strategic growth locations. We support the observation within policy 9 that the new allocations will deliver "a minimum of 21,000 dwellings" We also endorse the comment that "all the numbers above are the minimum number of dwellings to be delivered in each location." Policy 9 states that the transport infrastructure required to deliver growth and support the local economy will include a Long Stratton bypass. Paragraph 6.13 of the PSD highlights "the significant local benefits of a development-led bypass." We support this approach and will work with the GNDP to deliver a planned expansion of Long Stratton that will address this policy expectations set out in policy 10. We are in agreement with paragraph 6.5 of the PSD which underlies the contention that the housing allocations "for each location should be considered as a broad minimum to be achieved." We note that development is focused within the established urban areas "and in sustainable locations elsewhere in the Norwich Policy Area including major Greenfield developments." Given the range of employment opportunities and community facilities at Long Stratton, it plainly represents a sustainable settlement/location in the NPA. We acknowledge and endorse the observation in policy 9 that new employment development will be brought forward to serve the local needs of major growth locations. In that context, we concur with the comment at paragraph 6.9 of the PSD that "local employment will be expanded in Long Stratton." Long Stratton is appropriately identified on the plan at page 60 of the PSD as a settlement which will accommodate one of the "Main Housing Allotments". Policy SS4 of the East of England Plan describes a spatial strategy for those market towns which exhibit the potential to increase their economic and social sustainability. Long Stratton has both the potential and the capacity to achieve, through a planned expansion of the settlement, an urban renaissance and secure an appropriate amount of new housing, including affordable housing, local employment and other facilities. The settlement already exhibits a very high degree of utilisation of existing public transport facilities and the delivery of the spatial strategy for the NPA will enhance Long Stratton's accessibility, especially by public transport. The criteria established at Policy ss4 of the EEP can be fulfilled at Long Stratton. The GNDP Topic Paper: Strategy to Accommodate Major Housing Growth in the Norwich Policy Area acknowledges at paragraph 2.1 of appendix 3. Whilst the East of England Plan makes reference to strategic employment locations in the Norwich area, the JCS rightly acknowledges the fact that there are other, important local employment locations in the NPA. Indeed, the Topic Paper states at paragraph 3.2.3 of appendix 3. Long Stratton is a sustainable community within its own right and constitutes an appropriate location for further housing and employment growth within the wider NPA referred to at paragraph 6.1 of the PSD.

Joint Core Strategy Proposed submission Document

O - 11535 - 8271 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11535 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: **Goymour Properties Ltd. [8271]**

Agent: **Andrew Martin Associates (Mr Michael Calder) [8498]**

Full Text:

Summary:

Reasoned Justification: Whilst the general principles of Policy 9 are supported, we have concerns about the 'soundness' of the policy. Planning Policy Statement 12 (PPS12) sets out that the examination of any Development Plan Document is concerned with matters of legal compliance and soundness. To be 'sound' a CS should be: * justified; * effective; and * consistent with national policy. To be "justified" the CS must be: 1. founded on a robust and credible evidence base; and 2. the most appropriate strategy when considered against the reasonable alternatives. To be "effective" the CS must be: * deliverable; * flexible; and * able to be monitored. It is submitted that Policy 9 as drafted is not "sound" as it is not "justified" or "effective" for the following reasons: 1. We have concerns regarding the delivery of a minimum of 7,000 dwellings at the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle in the Plan period; 2. The reference to 'smaller sites' in the Broadland NPA allocation is ambiguous and requires further amplification; 3. the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport; and 4. The allocation for Broadland in the NPA should be increased from 2,000, to address any shortfall in housing delivery at the growth triangle. We expand on the above objections below: 1. The deliverability of a minimum of 7,000 dwellings at Old Catton, Sprowston, Rackheath and Thorpe St Andrew in the Plan period. Firstly, we query whether the quantum of development proposed can be accommodated on the ground. Appendix 5 of the JCS identifies the proposed Growth Triangle development area which will accommodate at least 7,000 dwellings in the Plan period, rising to at least 10,000 dwellings beyond 2026. We have prepared similar illustrative plan (enclosed ref: 08074/04b) which depicts the potential developable area required to accommodate the scale of growth promoted in the Growth Triangle. The plan is based on the crude calculation that a development of around 7,000 dwellings would require approximately 335ha of land and a development of 10,000 dwellings would require around 500ha. This calculation is based on a density multiplier of 30 dph across the site and then a discount of 30% to allow for land required to provide on site infrastructure i.e. roads, open spaces, community uses etc. The land parcels indicated on drawing ref: 08074/04 illustrate that a significant area of land in the Growth Triangle will be required to accommodate 7,000-10,000 dwellings and may need to take the form of two urban extensions if it is to avoid being 'cut off' from Norwich by the NNDR and avoid development on protected areas of land with important local and national designations such as the county wildlife sites, historic parks and gardens. We do not believe that development in the Growth Triangle on the land outside of the NNDR (east) would be conducive to a sustainable urban extension and in any event this remaining area of land does not comprise sufficient capacity to accommodate a development of an appropriate 'critical mass' to create a sustainable stand alone isolated settlement (which it would be by virtue of being cut off by the NNDR). Therefore there is some uncertainty surrounding the developability and deliverability of the land in the Growth Triangle. We are therefore of the opinion that Policy 9 should have flexibility and safeguards in its wording in order to provide for the 'other areas' in the Norwich Policy Area to compensate for any shortfalls of housing delivery in the Growth Triangle. This approach would provide sufficient flexibility in the spatial strategy and by implication would be a more "effective" strategy and thus "sound". Secondly, putting aside our concerns regarding the availability of sufficient land, we query whether the quantum of development proposed within the Growth Triangle can be delivered within the Plan period. The Growth Triangle is a relatively small geographical area and all hinges on a joint and phased approach to infrastructure and housing delivery. In the experience of Andrew Martin Associates, there is a time lag of around 5 years between the submission of a planning application for a major strategic site and delivery of first dwellings. In this case, based on the information in the public domain we estimate that an application may be submitted by 2011 at the earliest, resulting in a first build year of 2016. This would require average annual completions of 636 dwellings in order to have built a minimum of 7,000 dwellings by the end of the Plan period i.e. 15 years from the date of adoption as required by the East of England Plan. We consider that this would be an unrealistic level of delivery and that in reality a maximum of 400 dwellings per annum would represent a more realistic estimate. It is our experience that even where there are a number of parcels being brought forward by multiple developers, this average rate of delivery is unlikely to be exceeded as developers will build in line with market demand. Allowing for slightly slower completion rates initially, we estimate that 4,150 is a more realistic estimate of housing delivery for a single allocated area within the Plan period. A summary of this projected housing completions is set out below: (see table in attached document) Although the calculations above provide a relatively crude assessment, we consider that the maximum deliverable number of dwellings in the Growth Triangle is likely to be 4,000 dwellings by 2026. We are therefore concerned that such a high level of development is proposed in this area when there are still so many uncertainties. Development will require a joint and phased approach to infrastructure and housing delivery. In light of the foregoing, we consider that delivery of the dwellings proposed within the Growth Triangle is unlikely to contribute to the supply of housing at the point envisaged. PPS3 recognises the importance of a planning for a flexible supply of land for housing and the need for deliverable sites for housing and we do not believe that this is currently achieved within the JCS by virtue of overreliance on the Growth Triangle. We consider that it is therefore imperative that the GNDR examines the potential for development within the growth triangle in advance of setting the quantum of development to be achieved. Based on the foregoing we consider that a more flexible approach to housing delivery needs to be made so that sufficient sites can be allocated elsewhere within the NPA if the Growth Triangle building programme falls below the current estimates. A more flexible strategy which provides a better redistribution of growth to other areas in the NPA will provide greater certainty that the minimum RSS housing targets will be achieved within the Plan period to 2026. We consider that the strategy is not effective and that there is a requirement for further

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O - 11535 - 8271 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11535 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

contingency and flexibility within the strategy.2. The reference to 'smaller sites' in the Broadland NPA allocation is ambiguous. The second bullet point of Policy 9 sets out that of the allocations required to accommodate 21,000 new dwellings in the NPA, allocations for 2,000 of these dwellings will be identified within the 'Broadland smaller sites in the NPA'. Whilst we are supportive of the identification of allocations within the Broadland part of the NPA, the policy reference to 'smaller sites' is not explicit nor is it explained elsewhere in the supporting text or remaining sections of the document. We are therefore concerned that this reference to 'smaller sites' will cause unnecessary ambiguity in the preparation of subsequent Development Plan Documents (DPD) and furthermore, we consider this reference is wholly unnecessary. It is our interpretation that the reference to smaller sites in the document is a relative term to the significant growth planned in the Growth Triangle. Therefore in this case smaller sites would be those that are small in comparison to the 7,000 dwellings planned in the Growth Triangle i.e. sites of 1,000- 2,200 dwellings planned elsewhere in the NPA. However we accept that there can be some ambiguity surrounding the issue which is only like to cause unnecessary confusion and delay in production of subsequent DPDs. There is therefore a need for clarity on this issue within the JCS. Notwithstanding the above, we consider that reference to 'smaller sites' is wholly unnecessary and has the potential to be unjustifiably restrictive towards the type of development that will come forward at subsequent stages of DPD production. The key aspect of the policy as drafted should simply ensure that deliverable sites capable of accommodating a minimum of 2,000 dwellings are allocated in the Broadland part of the NPA at subsequent DPD production stages. There would not be sufficient flexibility in the JCS if Policy 9 predetermined the size of sites coming forward at subsequent DPD stages. Site size will of course be one of many other detailed determining factors, which will need to be considered at subsequent DPD stages. We consider site size is a detailed matter that is not appropriate for the JCS to determine. We can see no justification for favouring a particular size of sites to deliver housing requirement. There is a concern that smaller sites as a rule will struggle to bring forward the same level of local services and facilities that would be brought forward with a mixture of larger sites of 500-1000 units, which have a critical mass capable of delivering significant infrastructure. In the case of the Broadland NPA the most sustainable sites are those contained in the fringe parish of Hellesdon, which are close to Norwich city centre. These sites are typically capable of accommodating in the range of 500-1000 units and have sufficient critical mass to deliver or provide contributions towards the NNDR and Bus Rapid Transit planned for the area under the Norwich Area Transport Strategy. Unnecessarily restrictive wording could delay or prejudice delivery of these most suitable sites to the detriment of the spatial strategy. However, clearly these are still 'smaller sites' in comparison to the Growth Triangle. Therefore we submit that reference to 'smaller sites' should be removed from Policy 9 in order to remain "flexible" and thereby "effective" so that key decisions can be made at the next stages of the DPD process and ambiguity is removed from the policy.3. The dispersed nature of growth promoted in South Norfolk and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. One of the key implications of this part of the Policy relates to the potential for this spatial strategy to support sustainable patterns of transport and travel. It is our view that the dispersed nature of growth promoted in South Norfolk and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long-Stratton is remote from Norwich. Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location. This issue relating to Long Stratton has been highlighted through previous iterations of the Sustainability Appraisal. In addition, the quantum of smaller growth locations in South Norfolk will struggle to bring forward the same level of local services and facilities that can be brought forward in other areas of the NPA. We therefore consider that the allocation for Broadland sites in the NPA should be increased as set out in 4 below.4. The allocation for Broadland in the NPA should be increased from 2,000 to address any shortfall in housing delivery at the Growth Triangle. As identified above, we do not consider that all of the development proposed for the Growth Triangle can be achieved within the Plan period and therefore for the JCS to be "flexible" the policy must make adequate provision for an opportunity to re-distribute dwellings to other areas to maintain a consistent supply of dwellings during the Plan period. We consider that the allocation for the Broadland NPA should be increased given that our client is promoting a deliverable and highly sustainable site at the Royal Norwich Golf Club, Hellesdon which will contribute to delivery of a significant number of dwellings (up to 1000) and can bring forward a significant level of local services and infrastructure by concentration of a sufficient critical mass of development. In order to ensure that the JCS delivers a minimum of 21,000 dwellings in the Plan period and continues a rolling housing land supply at the current projected rates as required by the RSS we consider that the Broadland NPA should receive a potential further allocation in the order of 1,000 dwellings so that in the event monitoring of the JCS identifies slow rates of delivery in the Growth Triangle dwellings other sites in the NPA will continue to deliver minimum housing requirements. We do not believe that this approach would undermine the strategy as the figure of 21,000 dwellings is the minimum number of dwellings to be delivered in the Plan period and not a ceiling to growth that cannot be exceeded. Therefore by placing a contingency of a further 1,000 dwellings in the Broadland sites within the NPA the Council can provide a "flexible" strategy that will achieve minimum delivery targets. The GNDDP can take great comfort from its Strategic Housing Land Availability Assessment (SHLAA) which demonstrates that there is a significant supply of housing land within the Broadland part of the NPA which could deliver in excess of 3,000 dwellings. It is therefore our view that the Council should still seek a greater number of dwellings in the Broadland NPA, at least in accordance with the Council's previous Option 3 (Regulation 25: Technical Consultation Stage). This will provide a "flexible" and thereby "effective" policy so that key decisions can be made at the next stages of the DPD process. Whilst we acknowledge that the JCS is not necessarily the appropriate forum to consider detailed site proposals we do consider that it is necessary to provide such detail in relation to the representors site, the Royal Norwich Golf Club, Hellesdon (RNGC) in order to demonstrate that there are deliverable key sites in the Broadland NPA. During previous stages of consultation Goymour Properties have demonstrated that the site is "suitable", "available" and "achievable" for development in the Plan period and this has been recognised in the GNDDPs SHLAA process. Following a series of meetings with officers' at Broadland District Council, the promoters of the RNGC site have prepared an indicative Masterplan framework for the site which illustrates a development capable of accommodating up to 1,000 dwellings and associated social and community infrastructure drawing ref: 08074/03b.

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11535 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

(This site area has been subject of recent discussions with Broadland District Council and as indicative of expected delivery at this stage as the detail will be fixed in the next stages of the Site Allocations DPD but at this stage consider the above is deliverable.) The site is deliverable within the Plan period. The landowners and the developers are committed to bringing proposals forward. The site is capable of accommodating up to 1000 dwellings, contributing towards the housing requirements for the area. Development will provide affordable housing in accordance with the Council's requirements. The site will also provide the only realistic opportunity of addressing existing recreation and local open space deficiencies in the area. The Broadland Open Space Indoor Sports and Community Recreation Assessment, September 2007 identifies the RNGC site as falling within the Norwich Fringe. Within this area the following deficiencies of open space are identified: * Natural and Semi Natural Greenspace = -150.61 hectares; * Amenity Open Space = -3.30 hectares; * Provision for Children and Young People = -1.33 hectares; * Allotment = -1.10 hectares; and * Outdoor Sport = -10.64 hectares. The existing Golf Club is a private Members facility with little or no public use. The RNGC members will relocate to Weston Park Golf Club, Hellesdon, Norwich which is just 11km from the site and in the ownership of Goymour Properties Ltd. The development of the RNGC site represents an opportunity to provide a meaningful contribution to green/open space to meet more than just the needs of the development itself but soak up existing open space deficiencies in the area and provide new public access. The illustrative concept Masterplan illustrates a commitment to retention of existing mature woodland/tree belts and creation of a network of green infrastructure throughout the site. There is also proposed to be creation of a community use/hub which may provide a community hall with outdoor sport provision. The proposals would therefore increase the provision of Natural and Semi Natural Greenspace, Amenity Open Space, Provision for Children and Young People and Outdoor Sport. Any open space provided on site would be more accessible to the population than a private Golf Club and new areas of open space proposed on sites on the edge of the urban area. Finally, the site is in a highly sustainable location within the existing urban built form of Norwich, adjoining existing employment and residential development. The site lies in close proximity to a wide range of facilities and services. The site benefits from existing bus routes connecting the site with the City Centre and the railway station. The proposals would contribute towards public transport improvements, as necessary, and will benefit from the proposed NNDR and BRT improvements. Although this is a green field site, it is important to recognise that there is insufficient Brownfield land to accommodate housing and therefore sustainable green field sites, such as this will come forward in the Plan period. The land also lies within Flood Zone 1 and therefore the site is not at risk from flooding.

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O - 11553 - 8604 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11553 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Thorpe End Garden Village Residents Association Agent: N/A
(Mr Adrian Skipper) [8604]

Full Text:

Summary:

I am writing as Chair of the Thorpe End Garden Village Residents Association to confirm our continued objection to the Joint Core Proposals. Our association is greatly concerned that the proposal, if it goes ahead, will have significant detrimental effects on the environment and the local community. I would be most grateful if you could read and consider this letter in conjunction with our previous objections to individual planning application which make up elements of the Joint Core Strategy. We base our objections upon the failure of the Core Strategy when tested against the soundness tests outlined in your letter dated October 2009, in order to be justifiable; Core Strategies must be founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives. After careful thought and consideration the consensus of our committee is that these proposals are UNSOUND and there are far better alternatives available, which are much more suitable to meet the needs for housing, road infrastructure, sustainable employment and prosperity for the longer term with regard to Norwich and Norfolk, rather than through the allocation of major housing along the line of the proposed NDR, in order to fund the construction of the road. We would agree with the principles put forward in the GNDP summer update 2008 and quoting your words: "what we are working to achieve, local people will" o "Live in a distinctive place, whether part of the historic city, suburbs or fringe parishes, a market town, village or countryside o Trust that the special character of the countryside, natural, built and historic environment will be valued, protected, managed and enhanced, with people proud of where they live, work, study or visit. o Live a more environmentally friendly way of life in communities, which have efficiently managed water, energy, and water removal. o Have access to a wider variety of services and facilities, better health and high value, fulfilling jobs based on enhanced education and skills, increased prosperity and reduced deprivation in urban and rural areas. o Enjoy high quality surroundings in high standard homes, with support and care if needed, at a price they can afford. o Know that existing and new development will create communities, which are sustainable, foster pride and a sense of belonging." Unfortunately the current proposals do not reflect or deliver any of these aspirations listed above. We agree with the wording that 'the fundamental question is the establishment of principles' but we think these principles should include the concept of saving, preserving and enhancing existing villages, market towns and their communities within the County of Norfolk and in this respect the consultation documentation is lacking. At the centre of the proposed Core Strategy is that Norwich will be the centre of activity and employment. One of the outputs of this strategy is the Norwich Area Transport Strategy (NATS) its principle objective to transport people to and from Norwich. Again, an output of this is a massive carbon footprint, pollution in the form of carcinogenic fumes, increased noise and congestion. A further example of this can be observed with the current park and ride at the A47 Postwick junction, 70% of traffic, currently using it is from the coastal areas, at the same time there are business parks empty in the area they are coming from. The JCS housing proposals are fundamentally unsound as these allocations are totally reliant on the construction of the proposed NDR. A decision on whether the road will even be funded by central Government will not be made until 17 December 2009. Without the NDR, the GNDP has accepted the allocation cannot proceed. The proposed NDR will not decrease traffic; on the contrary, it will significantly increase traffic for Norwich and Norfolk. An integral part of the NDR plans are the proposed closure of Smeeth Lane, Low Road and Middle Road, again the closure of these feeder roads will result in the funneling of traffic on to the Plumstead road, Salhouse road and Thorpe Road causing even more congestion! No provision is made in NATS or the JCS for the urgently required link road from the C874 Plumstead Road to the Postwick roundabout. This should have been implemented by now and be in place, as it was an integral part and requirement of the planning consent, 71.19 TSA3, allocated in policy TSA2 subject to 71.19 subsection d) for the current Business Park. Consequently traffic is increasing on a daily basis on Green Lane north with all the associated environmental pollution and severe blighting of residential property. Denudation of villages and the migration of people, especially young people because of the lack of affordable homes and employment is a major problem that needs to be addressed. The National Housing Federation recently reported, quote: "Traditional village life could be eradicated within a generation as the cost of country living drives young people into cities" it goes on to state: "More than 100,000 under 35s are expected to migrate from villages and market towns across England to urban areas by 2012". We have to stop this. These policies will lead to conurbation with all the associated problems. This report/consultation document does not 'predict' growth in this sector, so much as 'prescribes' it and uses as a justification the need for affordable homes.

Joint Core Strategy Proposed submission Document

S - 11556 - 8603 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11556 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: B Lanmar 1 LLP [8603]

Agent: Woods Hardwick Planning (Mr Tim Collie) [7449]

Full Text:

Summary:

This policy deals with the growth locations in Norwich in greater detail. The Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle is set to accommodate 7,000 dwellings to 10,000 eventually. This is up from 6,000 dwellings envisaged in the Regulations 25 Consultation in 2008. The Rackheath Ec0-Community has prepared a masterplan for 4, 150 dwellings, so it is clear that a significant number of dwellings will need to be provided outside the current limits of the Ec0-Community which could include the representation site. We would welcome the preparation of a further masterplan demonstrating long term integrated planning for the whole triangle, with the provision of sustainable transport of dwellings and employment provision in line with local and regional targets.

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O - 11561 - 8268 - Policy 9: Strategy for growth in the Norwich Policy Area - ii

11561 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: RSPB (East of England Regional Office) (Dr Philip Agent: N/A
Pearson) [8268]

Full Text:

Summary:

The Council states that the 'plan is ambitious' and their 'aspirations are high'. This approach understandable given the need to balance the development requirements laid out in the Regional Spatial Strategy against the considerable constraints created by designated sites, the need for improved infrastructure and the on-going changes within the Local Authority System. The Council must ensure, that their ambitious approach does not negatively impact on important sites for nature conservation. We have a number of concerns over the plan as it stands. All impacts on Natura 2000 sites must be carefully screened (refer to sect.1 and 2 annex to this letter) to ensure that the proposed level of growth is possible especially when in-combination impacts of neighbouring Council's plans are taken into consideration. Throughout the Core Strategy it is stated that the Norwich Area Transport Strategy (NATS) 'is fundamental to the delivery of this strategy'. It is important to note that the NATSS is dependent on the construction of the Norwich Northern Distributor Road (NDR) but funding has not been secured for this project and is not guaranteed in the future and adverse impacts to the River Wensum Special Area of Conservation must be avoided. If the NDR is not deliverable this will require a significant revision of the NATS and the JCS. If the NATS is not deliverable then the housing delivery (POLICY 4) and the strategic growth in the Norwich Policy Area may be threatened. This significant uncertainty undermines the soundness of the current plan.

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O - 11566 - 7463 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11566 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: GO East (Ms Mary Marston) [7463]

Agent: N/A

Full Text:

Summary:

Policies 9 - Strategy for growth in the Norwich Policy Area - and 10 -Locations for major new or expanded communities in the Norwich Policy AreaKey dependencies4. National policy for transport is seeking to move the focus away from the 'predict and provide' approach of the past and to focus on the challenge of delivering strong economic growth while at the same time reducing greenhouse gas emissions, (see DfT guidance on 'Delivering a Sustainable Transport System - 'DASTS', published in November 2008). This now provides the policy context for the third generation of Local Transport Plans, and more generally informs our consideration of proposed transport policies and priorities, as articulated in emerging core strategies. 5. We welcome the strengthened commitment to the development of new and expanded communities which 'will be highly sustainable with good access to local jobs...and local centres...and facilities easily accessible by foot, bicycle and public transport'. The inclusion of this statement in the vision is echoed elsewhere in the plan: the commitment to reducing travel need and impact (Objective 7), to minimising contributions to climate change (Objective 1 and Policy 1), and to promoting more sustainable travel choices by delivering a package of measures considered necessary to support growth across the Norwich Policy Area (NPA), as identified in the Norwich Area Transportation Strategy (NATS).6. Transport priorities listed under Policies 9 - Strategy for growth in the Norwich Policy Area - and 10 - Locations for major new or expanded communities in the Norwich Policy Area - include:* Construction of the Norwich Northern Distributor Road (NDR);* BRT via Salhouse Road to the city centre;

* safe and direct cycle and pedestrian routes, orbital bus services to Broadland Business Park, Rackheath employment area, airport employment areas and surrounding countryside; permeability across the NDR;* new rail halts at Rackheath and Broadland Business Park;However, Policy 10 identifies development as dependent only on the NDR, and supporting text (para 6.7) to Policy 9 states 'the NDR is the fundamental part of the Norwich Area Transportation Strategy (NATS) and this growth strategy'. 7. Whilst it is argued that significant improvements to bus, cycling and walking networks can only be achieved with the road capacity released by the NDR (page 7, and paras 3.11 and 5.44 refer), we question the over-riding priority given to construction of the NDR, and whether this is consistent with the commitment in Policy 1 to 'give priority to low impact modes of travel'. We note the indicative timings for the delivery of sustainable transport interventions set out in Appendix 7 and our concern is that existing road based travel patterns will be reinforced, whilst a more robust approach to demand management is deferred. 8. In addition, we understand that modelling of dependant development has been undertaken to support the NDR business case which suggests that, whilst the NDR would facilitate access to growth locations, some development in the North East of Norwich could proceed ahead of the NDR. 9. Similarly, growth at Wymondham, Hethersett, Cringleford and Eaton/ Costessey is identified as dependent on significant investment in road infrastructure, whilst investment in sustainable transport modes will need to be delivered in tandem with development. Again, we question the justification for a 'sequential approach' to transport infrastructure required to support growth locations in South Norfolk, more particularly because the NATS modelling evidence suggests only a weak relationship between the NDR and congestion relief in the south of Norwich. 10. We comment further on infrastructure delivery in our representations on Policy 20 - Implementation and Monitoring - below, but in summary, our principle anxiety is that the time frame for the delivery of sustainable transport interventions is loaded towards the latter part of the plan period, when funding is less certain. We would encourage the Partnership to identify opportunities to 're-balance' the transport strategy, for example by ensuring that the Local Transport Plan and the NATS Plus Implementation Plan prioritise low impact modes of travel and make optimal use of the available funding. Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle11. Policy 9 - Strategy for growth in the Norwich Policy Area - identifies the growth triangle, including Rackheath, for large scale growth - 7000 dwellings to 2026, rising to 10,000 by 2031. The spatial vision states that 'inspired by the exemplar eco-community at Rackheath, zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management of sustainable communities and new buildings which improve energy efficiency and use renewable energy'. 12. In supporting text to Policy 9, para 6.6 states that 'the growth triangle incorporates land at Rackheath being promoted for an eco-community under the governments Eco-towns programme and development of the rest of the area will be expected to reflect similar high standards'. Elsewhere, design standards and requirements for master planning (Policy 2), and thresholds for compliance with the Code for Sustainable Homes (Policy 3) apply throughout the plan area. 13. Policy 10 - Locations for major new or expanded communities in the Norwich Policy Area - states that development will achieve the highest possible standards of design. Supporting text (para 6.14) states that 'A large part of the development at Rackheath is promoted as an eco-community under the Government's eco-town programme. The Rackheath eco-community will remain part of this strategy even if the Government programme falters'.14. None of the above policies refer explicitly to the eco-town PPS, and that neither Policy 9, nor Policy 10, appears to set higher standards for Rackheath than for the rest of the NPA, although read together, supporting text to both policies suggest that standards set for the Eco-town at Rackheath are expected to apply across the growth triangle. To avoid ambiguity, a clear and consistent statement of policy in relation to development standards expected for Rackheath, the growth triangle, the NPA and the plan area as a whole, is required. In addition, your submission draft should clarify whether you intend to prepare an Area Action Plan for the growth triangle.

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O - 11571 - 8018 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11571 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: The pattern of development envisaged for the South of the city is relatively dispersed in comparison with both the favoured approach in the initial Issues and Options consultation document and that currently proposed for the North East of the city. This raises questions of planning strategy coherence, the viability of infrastructure and achieving a modal shift away from car use. Limits on sewerage capacity in 6.9.2 of the document Water Cycle 2b means that the majority of development at Long Stratton will not be able to commence until 2020.2a One of the main issues here is the provision of secondary education which, as the report states for Wymondham, Hetherset and Easton/Costessey 'remains to be resolved'. This significantly questions the viability of the current growth strategy. Cringleford, meanwhile, is 'reliant on a solution at Hetherset'. Dispersal of most of the planned growth onto these 4 sites means that new housing will merely put pressure on existing schools rather than justify the creation of a single new school. With the high level of pressure there is likely to be on public finances, the likelihood that all three existing schools may have to be relocated to accommodate growth would represent an unacceptably expensive solution which would either be prohibitive to viable development or divert funds from much needed capital projects elsewhere. The only alternatives would be greater use of mobile classrooms or creating one school to which pupils would travel to by bus - both options are far from ideal. The uncertainty and potentially prohibitive cost implications for this solution mean that the strategy is not compliant with Section 4.45 of PPS12.2b It is likely that that a similar situation would exist with other public services with existing services being put under pressure and a lack of concentration of development to justify the creation of all new accessible services. The creation of a new retail centre in walking distance of new development similarly becomes less viable.2c Similarly, with public transport into the city, the strategy is almost completely reliant on Bus Rapid Transport (BRT) routes to deliver the step change necessary to effect modal shift away from car use. The funding for the BRT has not yet been identified, but is more likely to be forthcoming if a more compact and concentrated form of growth was envisaged. It is likely that refocusing local railway services to provide a more frequent service, with possible line extensions and use of tram-trains or all-in bus links and/or significantly improved bus links to the Norwich Research Park area and to employment areas to the east and north-east of the city would also be needed to effectively compete with the private car. Such significant investment is unlikely with the dispersed form of growth currently envisaged and, without it, the car is almost certain to remain the primary means of travel.2d The justification for this form of growth is made on the grounds that the preferences of local communities have been taken into account and also that it would result in 'altering not only the character of the settlements themselves but also eroding the degree of separation between settlements and Norwich'. These arguments could similarly be applied to development in the north-east of the city, yet no evidence is supplied to suggest why it is adopted here and not to the north-east. Indeed, separation from the city is more likely to be maintained to the south-west due to the restrictions on development in the Yare Valley and in the protected zone adjacent to the Southern bypass. Similarly, the preferences of local communities against large scale development at Rackheath has been just as vociferous and well-articulated. One can only conclude that the reason for the contrast in approach is more likely to be down to the expressed preferences of the relevant council(s) rather than any sound evidence-based planning reasons.2e Development at Long Stratton is perhaps the clearest example of a fundamentally misconceived pattern of development to the south-west of the city. As highlighted in the sustainability report, this is a contentious development. With only one single carriageway in and out of the city there is no incentive for people to take public transport, as there is no 'time or distance' advantage in them doing so. Improvements in the frequency of bus services to this area would have little effect. This location is simply too far out of the city and is unlikely to support a full range of services and job opportunities in its own right. Given also that it is not accessible by rail, it cannot be considered the most sustainable location for major development. Development contributions from 1800 houses is unlikely to be sufficient to support the construction of a bypass, so the likelihood of sufficient funding overall has to be questioned. There is also the other point that the bypass would be soaking up money that could otherwise be spent on more socially desirable outcomes such as education, green spaces, social housing or public transport.

Joint Core Strategy Proposed submission Document

O - 11583 - 7738 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11583 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Anglian Water (Mrs Sue Bull) [7738]

Agent: N/A

Full Text:

Summary: Policy 9: most of the distribution for new housing will go to Whitlingham, however the other names are Long Stratton and Wymondham (Long Stratton may be an issue)

Joint Core Strategy Proposed submission Document

O - 11601 - 8203 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11601 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Country & Metropolitan Homes - formerly Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes objects to Policy 9 as it fails the Justified and Effective soundness tests. C&M Homes notes that Policy 9 sets out the growth distribution strategy for the Norwich Policy Area. From this, it is noted that growth is to be focussed in the city's urban area, a strategic urban extension to the North East of Norwich, with lesser growth in a limited number of Broadland fringe parishes; and a growth dispersal across the South Norfolk district with strategic growth split between a number of settlements and "smaller" scale growth to other unspecified locations in the Norwich Policy Area, with no indication of the level of growth at each of these settlements. At Hethersett growth is limited to 1000 homes. This is a significant change from the initial spatial strategy which proposed 4000 homes at Hethersett which was a strategy underpinned by credible and robust evidence based upon the delivery of viable sustainable development. The evidence available does not substantiate how a reduction in the growth at Hethersett can be 'justified', and doesn't provide sufficient flexibility for the strategy for growth to be deliverable and therefore 'effective'. C&M Homes supports the continued approach for the allocation of 1800 units across South Norfolk sites within the NPA including possible additions to strategic growth locations (including Hethersett). We would suggest that further clarification on the distribution of this allocation is required. In the case of Hethersett, if the evidence suggests that the settlement could accommodate up to 4,000 units, in order to ensure continued housing delivery and maintain a reasonable level of deliverable housing land supply, allocation of up to 200 units of the 1800 allocation could be a possible addition to the growth currently envisaged for Hethersett. An early release/delivery of land at Great Melton Road, Hethersett of up to 200 units could be delivered within existing environmental capacity and constraints as identified by the JCS Spatial Vision. An early release to ensure the policy approach is 'effective' is particularly critical where Appendix 6 of the JCS suggests that annual housing delivery rates will not be delivering units in Hethersett until 2014. An earlier release under the 1800 allocation could deliver units in Hethersett much sooner, subject to Planning Permission in 2011.

Joint Core Strategy Proposed submission Document

O - 11611 - 1823 - Policy 9: Strategy for growth in the Norwich Policy Area - i

11611 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

The second issue concerns the conflicts within the vision statement. It is clear that there is no consistency within the Spatial vision as it affects segments of the Norwich Planning Area, which are under the control of different councils. This leads to a solution which places a very uneven loading on existing local communities and creates a serious problem for the provision of support services. Concentration demands a much greater investment in infrastructure and as an example of this problem the building of a major four lane highway, described as the Northern Distributor Route, tangential to the city will do little to help city traffic flows but will create extra journeys and increase dependence on the motor car which this strategy claims to be seeking to ameliorate as it is a major contributor to climate change. Yet in other areas surrounding the city there are already more readily accessible road and rail networks. There appears for some reason a reluctance to utilise them. The areas which would be described in this way would be (a) the A47 corridor to the East of the city which is conjoined by a rail line with two spurs out towards Acle and Reedham and (b) the A11 Corridor to the south with two separate rail lines one to Diss and the other to Thetford. Transport will be a significant problem with or without the NDR especially in those areas beyond the North East Development triangle. There seem to be no plans to improve local roads and access to both Wroxham and Norwich will become more difficult for residents in this area. The plan to rename Salhouse Station as Rackheath will avoid the construction of a second station but there remains a significant drawback to the plan to use the railway as a commuter tramway. The alternative to introduce buses as rapid transit would appear to be flawed unless it is coupled with a scheme to provide them with priority access. In any case this would have to be at the expense of other users. Having created a car based economy with out-of-town shopping malls it seems that there needs to be a more fundamental rethink of the transport policy in the city as well as the suburbs.

Joint Core Strategy Proposed submission Document

S - 11623 - 4054 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11623 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Building Partnerships Ltd (Mr Paul Knowles) [4054] Agent: N/A

Full Text:

Summary:

We are pleased to note that the strategy for growth in the Norwich Policy Area sets out in Policy 9 the inclusion of an increase in employment land of around 30 ha close to Norwich Airport. We would not wish to take issue with the legality of this process and consider that the document provides a robust assessment of the evidence base and has responded positively to previous rounds for consultation. The overall approach of preparing a JCS is supported. The joint working of the councils in the NPA provides a comprehensive approach based on a single database of information. It results in a coherent strategy that paves the way for site specific work that all councils can take forward in similar timescales. This approach is a refreshing change and contrasts with the approach being adopted in other parts of the region. We support the approach to transport planning which includes a proposed NDR. Whilst the strategy relies on a favourable decision on the funding for the NR it is the most practical way to create capacity and to provide a modal shift to Rapid Bus Transit in Norwich. We therefore agree with the statement set out on page 7. The implementation of the NDR would clearly deliver benefits to the Growth Triangle and the area around Norwich Airport in terms of its general accessibility. The reliance upon private vehicle movements could be actively discouraged in a new employment area by incorporating improved public transport links with the airport and a relocated park and ride to a site close to the proposed A140 junction with the NDR. It is understood that a decision on funding is expected from the Department of Transport on 15th December, one day after representations have to be made to the JCS, and we trust that a positive outcome will be received. In the event that this decision is unfavourable, Building Partnerships will work with GNDP and other key stakeholders to ensure that an alternative strategy is quickly brought forward which would support delivery of the employment aspirations in the area. Policy 9 on page 58 sets out that the strategy for growth in the NPA refers to employment growth including "around 30 hectares of new business park focussed on a full range of employment uses benefiting from an airport location". We believe that this will support investment in a key strategic location with a focus for employment growth. This will be enhanced by reference to separate airport related development for "aviation related uses". Associating this with a relocated park and ride facility would enhance it as a key destination on the public transport network. The land edged red on the attached plan lies immediately adjacent to the A140 and is directly affected by the proposed route and junction for the NDR in this location. The total site extends to around 62 ha. Part will be affected by the NDR and part required for landscaping areas for any development. The remainder will provide suitable location for employment use. This representation supports the strategy for growth in the NPA as set out in Policy 9 and the inclusion of the area close to the airport as a location for a new employment area for a full range of employment uses. Development in this area would be entirely consistent with the planning objectives of the JCS. Development of the site edged red on the plan would be appropriate to delivering this growth scenario envisaged.

Joint Core Strategy Proposed submission Document

S - 11627 - 7523 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11627 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary:

The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development. Regional policy supports proposals for the Norwich Northern Distributor Road (NNDR). The East of England Plan Panel Report (published in June 2006) stated that development of the NNDR is 'essential to improve the quality of life in residential areas, aid rural regeneration ... and facilitate urban expansion'. Urban growth policies of the JCS are consistent with this approach. Development of the NNDR is currently scheduled for pre 2013/14. Improvements to the A11 and A47 are under consideration. Provision of a bypass on the A140 at Long Stratton is not currently included in regional transport objectives.

Joint Core Strategy Proposed submission Document

S - 11642 - 8610 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11642 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Royal London Mutual Insurance Society Limited **Agent:** Savills(Manchester) (Mr Tim Price) [4303]
[8610]

Full Text:

Summary: We support the GNDP in its strategy to consolidate activity at Longwater through intensification and completion of the existing allocation in order to assist in the growth in the Norwich Policy Area.

Joint Core Strategy Proposed submission Document

O - 11657 - 8366 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11657 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. The BLT welcomes the addition of the paragraph 3 of policy 9 (previously policy 2) which acknowledges that the numbers of dwellings expected in each are considered to be the minimum. As with policy 6 above, in representations made to the regulation 25 consultation the BLT suggested that policy 9 (previously policy 2) should make reference to an innerlink road in the area being promoted by the BLT, which has been safeguarded in two parts. Our justification for suggesting this amendment is contained in previous objections. The GNDDP have not provided any response to previous representations and therefore have not justified why they have not included the BLT's suggested amendments. It is noted that policy 9 promotes that employment development in strategic locations (notably University of Norwich, Norwich Airport and Broadland Business Park, Wyndom, Hethel and Rackheath). Throughout their involvement in the JCS and through previous representations, the BLT have highlighted their intention to promote their land for a sustainable urban extension based around walkable neighbourhoods. This involves the appropriate mix of land uses to create opportunities to encourage modal shifts towards more sustainable modes of transport. However, it seems that this policy encourages the separation of employment land uses in the context of growth. In creating a footprint for a sustainable urban extension to the North East of Norwich, it is critical that it incorporates a sophisticated approach to an appropriate mix of uses. On this basis we suggest that policy 9 includes a strategy that encourages a sustainable mix of land uses in order to delivering sustainable and walkable neighbourhoods.

Joint Core Strategy Proposed submission Document

O - 11665 - 8511 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11665 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary: Paragraph 6.3 claims that the proposed allocations in the settlements it identifies would be in 'well located and serviced' settlements. We object to the inclusion of Long Stratton in this list, for the reasons set out in our accompanying objection to Policies 9 and 10, as the description is not applicable to it.

Joint Core Strategy Proposed submission Document

O - 11666 - 8511 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11666 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary: Paragraph 6.9 notes that 'local employment will be expanded in Long Stratton.' It is not clear what the basis for any expansion in employment would be, and whether it could be accommodated sustainably within the village. Long Stratton is currently a village of limited size (3,701 people at the time of the 2001 census), and while a limited amount of local employment may be appropriate, any expansion of employment facilities must remain in proportion with local demand. We have objected in separate representations to the proposed level of development in Long Stratton. Should the proposed allocation be deleted, as we have advised, then the Core Strategy should ensure that the level of employment provision in Long Stratton accords with the village's limited population. We therefore believe that it is not appropriate to mention Long Stratton in this paragraph.

Joint Core Strategy Proposed submission Document

O - 11671 - 8511 - Policy 9: Strategy for growth in the Norwich Policy Area - i, iii

11671 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

The rural allocations for Broadland and South Norfolk Districts, which are set out in Policy 9, and detailed in the GrowthLocations Table, form a significant proportion of the overall growth proposals, but it is unclear on what basis the GNDP have arrived at these figures. Taken together, the proposed developments on 'additional sites' in Broadland and South Norfolk total 5,450 dwellings. This is almost a quarter (24%) of the total number of dwellings allocated by the CoreStrategy. However, the document and its supporting evidence base contains very little technical evidence or justification for these allocations. The 'Strategy to Accommodate Major housing Growth in the NPA' Topic Paper indicates that the various options for housing distribution considered by the GNDP have always included rural allocations on this scale, with any debate having relating to the proportional distribution between towns. We are concerned that the requirement in PPS12 to test the strategy against reasonable alternatives, such as a higher concentration of development in towns, has not been met. If this is the case, the Core Strategy is unsound. We believe that allocations in the rural area are by their nature less suitable than those in the larger settlements which have good transport connections and a range of local services and facilities. PPS1 and PPS3 suggest that new developments should where possible be located where there will be less need to travel, particularly by private car. The proposed allocation for the rural areas would constitute a very significant amount of development, greater than at any of the strategic growth locations, and as such it must be justified. We believe that at least part of this allocation should be redirected to larger settlements with capacity for additional development, such as Wymondham, as this would represent a far more sustainable strategy. It should also be noted that additional development in Wymondham would help to contribute towards the financial viability of the proposed Bus Rapid Transit service which will provide a high quality public transport link linking Wymondham, Hethersett and Norwich. This would clearly be a far more sustainable form of development than dispersed development in locations where there is no reasonable public transport alternative.

Joint Core Strategy Proposed submission Document

O - 11672 - 8511 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11672 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

The Sustainability Appraisal for the Core Strategy demonstrated that the most appropriate option for development ('Option 1') is one which locates 4,000 new dwellings in Wymondham and none in Long Stratton. There are sound reasons for this, and we believe that the Core Strategy, which follows the less sustainable approach outlined in the SA's 'Option 2', has disregarded broad sustainability benefits in favour of narrow local concerns. The approach taken represents a compromise on the sustainable form of development offered by development on the A11 corridor, with the more narrow aim of delivering a new bypass for Long Stratton. This approach would result in a highly unsustainable form of development at Long Stratton, which would not be of benefit to the Core Strategy area as a whole. Paragraph 6.1 of the Core Strategy notes that the East of England Plan identifies Norwich as a Key Centre for Development and Change, and that the Norwich Policy Area is identified as the location for the growth related to Norwich. Paragraph 13.68 of the East of England Plan describes the Norwich Policy Area as 'the urban area, the first ring of villages and the market town of Wymondham'. This description does not appear to include Long Stratton, which is a village somewhat removed from the rest of the Norwich Policy Area. There appears to be no justification in terms of regional policy for the significant allocation which is proposed at Long Stratton. Benefits of Clustering Development in the A11 Corridor The Core Strategy aims to bring a number of benefits to the A11 corridor at Wymondham, Hethersett and Cringleford. These include new high quality sustainable transport links, as well as the enhancement of local services and facilities, and a potential reduction in commuting trips to Norwich through increased self-sufficiency. Potentially the most important of these benefits is the delivery of a new Bus Rapid Transit service to Norwich. We believe that a high quality public transport link such as this could help to make future development in this area truly sustainable, as it would complement the good bus and rail service which already exists, and provide a truly viable alternative to the private car. However the Sustainability Appraisal of the Core Strategy notes that the level of development allocated to these settlements (4,400 dwellings) 'is at the borderline of providing a potential market sufficient in size to support the development of a Bus Rapid Transit service. Increasing the total housing allocation for to 5,000 would provide greater comfort regarding the market potential for BRT on this corridor.' (SA, para 2.2.58) It is therefore clear that it would be desirable to allocate additional development to the A11 corridor, to ensure the delivery of essential infrastructure. Clustering development in the settlements on the A11 corridor, and particularly in Wymondham, will also bring local economic and sustainability benefits. The Core Strategy notes that Wymondham is the only main town with significant capacity for growth. While Wymondham currently loses trade to Norwich, the proposed expansion of employment and retail development, as well as local services and facilities, will help to make it more self-sufficient. It will be better able to serve the needs of its population, and that of the rural hinterland and adjacent settlements, thus reducing the need to travel to Norwich. The RSS identifies Wymondham by name as being a location for growth. Policy NR1 of the RSS also notes that the Wymondham/A11 corridor should be a focus for employment development, particularly high-tech development and rail related uses. The Sustainability Appraisal has demonstrated that Wymondham could accommodate a greater level of development, which would further enhance these benefits through improved local facilities and better public transport links. It also demonstrates that this would be a preferable option to the one proposed by the Core Strategy. Policy 9 should therefore increase the housing allocation for Wymondham, so as to enhance the inherent sustainability benefits which this aspect of the Core Strategy can deliver. Proposed Development at Long Stratton Local Views on the Proposed Development As noted above, Policy 9 allocates 1,800 dwellings to Long Stratton for the single purpose of delivering a new bypass. The Core Strategy refers to Long Stratton as a village, and notes that 'Stimulated by growth, commercial development may be sufficiently strong to begin to move the village towards Main Town status' (CS, page 82). The 2001 Census showed that Long Stratton had a population of 3,701 at that time. The Infrastructure Topic Paper estimates that the proposed 1,800 homes would bring in an additional 3,817 people to the village, effectively doubling its size. However, the Core Strategy does not appear to consider the potential impact on the character of the village. The representation by Long Stratton Parish Council to the Regulation 25 public consultation, earlier in 2009, also highlighted the apparent opposition of local people to the proposed development. This representation noted: 'It is apparent from the result of a survey undertaken by the Parish Council, via the Village Magazine, and views expressed by residents during a public participation period at a recent Parish Council meeting, that two thirds of those responding and giving views are against the proposal, with only one third of those responding being in favour of the number of new homes proposed and then only conditional upon a Long Stratton Bypass being in place first. Having considered the views of residents and debated the matter, the Parish Council objects to Option 0 and cannot support the proposal.' The Issues and Options Report of Consultation also notes that: 'Whilst the Long Questionnaire gave results in favour of growth to provide a Long Stratton bypass, the local survey (undertaken by South Norfolk District Council) indicated that local people are evenly divided for and against such a solution. Only a minority of local people would support a development in excess of 1,500 dwellings.' In light of this evidence, it is not clear on what basis the bypass is being proposed. Any local benefits it will bring appear to be of less concern to many of the local residents than the likely negative effects. Technical Evidence Base Whilst the Sustainability Appraisal notes that the Long Stratton bypass would bring local benefits in terms of improvements in air quality, when viewed in the context of the Core Strategy as a whole, it is clear that it is not the most appropriate use of limited resources. Page 9 of the Core Strategy refers to the balance which the document has sought between 'technical evidence against the preferences of local communities', noting that the Long Stratton bypass has been proposed on the basis of the latter of these two issues. While the comments of the Parish Council appear to contradict this assertion, the Sustainability Appraisal is explicit in pointing out that the proposed bypass is not supported by the technical evidence either: 'However, one of the major growth

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11672 Object

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locations - Long Stratton - does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA.' (SA, page VIII) Objective 7 of the Core Strategy aims to reduce the need to travel, particularly by private car, through the location and design of new development. It also aims to provide sustainable modes of transport as an alternative to private cars. These aims are consistent with the guidance set out in national planning policy documents such as PPS1, which seeks to direct development to locations which will 'reduce the need to travel' (PPS1, para 23, point vii). Key Principle (ii) of PPS1 suggests reducing carbon emissions through 'encouraging patterns of development which reduce the need to travel by private car' (PPS12, para 13, point ii). The proposed Long Stratton bypass would be contrary to these aims. It would make the route more attractive to motorists due to improved journey times, with the likely result that traffic would increase as it was used for less essential journeys. Long Stratton also lacks suitable public transport connections, and so the many new residents (estimated in the Infrastructure Topic Paper to be 3,817 people) would simply add to this increase in car traffic, as they travelled to higher order settlements (particularly Norwich) for employment and key services. The Core Strategy notes that much of the existing transport network is currently operating at 90% of its capacity. However, it does not appear to consider the direct effect which the proposals for Long Stratton will have in increasing traffic on the roads in and around Norwich, and how this will relate to its other proposals. A further concern with regard to locating development in Long Stratton is that it is currently relatively isolated from many sources of employment, and the proposals in the Core Strategy will not remedy this situation. While the Core Strategy has considered the larger settlements, such as the Main Towns, to be suitable locations for strategic employment growth, Long Stratton is referred to as a village, and has clearly not been considered either sufficiently well connected or of a sufficient scale to include such an allocation. Any new development in Long Stratton will continue to be isolated from sources of employment, therefore generating unsustainable commuting patterns. The Sustainability Appraisal supports our conclusions in its summary of the effects of Policy 9, noting: 'At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away).' (SA, page 58) This appears to echo the GNDP's conclusions at Appendix 4 of their Issues & Options consultation document: 'Long Stratton provides a range of local services and some local job opportunities. It is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time.' The SA also noted the contrast between the 'local level benefits associated with growth at Long Stratton' and the 'more strategic disbenefits' (SA, page VIII). Implications for the Funding and Delivery of Infrastructure The Core Strategy notes that the Long Stratton bypass is a prerequisite for development in the village. The 2008 Regulation 25 draft of the Core Strategy noted that Long Stratton could only accommodate in the order of 20 - 50 dwellings prior to the completion of the bypass. Core Strategy is not clear on where the funding for the bypass will come from, other than vague statements that the new housing is intended to pay for it. The Infrastructure Topic Paper outlines the need for a huge amount of new infrastructure across the Norwich Policy Area, in order to deliver the development proposed in the Core Strategy. The Core Strategy itself notes that 'the cost of the infrastructure required is likely to exceed the expected income from all sources' (para 7.4). The Infrastructure Topic Paper also notes that in excess of £112 million will be required to deliver the proposed development in Long Stratton (a figure which is somewhat higher than the £35 million estimated to be required to build the bypass alone). If this funding is to be drawn from a central pot, it is likely that either these or other competing infrastructure projects will be delayed or even abandoned. Alternatively, if development at Long Stratton is to be self-funding, the cost of borrowing over the (minimum) ten year period which the bypass, housing and associated development would take to build, could effectively double the overall cost of the necessary infrastructure. Given the apparent scarcity of funding for the ambitious proposals outlined in the Core Strategy, it is also unclear on what basis the proposed development in Long Stratton can be justified. The Core Strategy does not appear to promote any evidence to support of the need for development in the town, other than in order to fund a bypass. The Core Strategy does not set out the context of the high price this will require in relation to the limited local benefits it will bring. It is also unclear from the information made available by the GNDP how the apparent funding problems will be resolved, and with what certainty the Core Strategy can claim that the proposed 1,800 home development at Long Stratton will fund the £112 million cost of the necessary infrastructure. Where Core Strategies rely on the delivery of infrastructure, PPS12 requires them to provide evidence of 'who will provide the infrastructure and when it will be provided' (PPS12, para 4.8). This should be set out in terms of: 'infrastructure needs and costs; phasing of development; funding sources; and responsibilities for delivery.' (PPS12, para 4.9) PPS12 also notes that Core Strategies should make 'proper provision for... uncertainty and... not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning - showing how the objectives will be achieved under different scenarios - may be necessary in circumstances where provision is uncertain.' (PPS12, para 4.10). We are also concerned that the high cost of the bypass will result in a reduction in the other essential infrastructure which can be delivered in Long Stratton. In its summary of the three growth options tested, the Sustainability Appraisal suggests that the 'Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.' (SA, page 39). In contrast, the Core Strategy repeatedly implies that this will not be the case. We are therefore concerned that the Core Strategy is not only inconsistent with the recommendations made by the Sustainability Appraisal, but in fact makes statements which are contrary to its

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11672 Object

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conclusions (we have addressed some of the more profound inconsistencies in separate representations). We have also noted the comments of the Chairman of South Norfolk Council's Cabinet, and Leader of the Council (from the 25 September 09 meeting which approved the Pre-Submission Core Strategy), who made the following comment in relation to a proposed summary of the Core Strategy: 'He added that the summary of the Strategy needed expanding to emphasise the stepwise nature of the proposed development and clearly link the provision of infrastructure to homes. The summary would also need to acknowledge that a large proportion of the 57,500 new homes referred to were speculative and would not be delivered by 2031.' This view, from the Leader of South Norfolk Council, casts doubt on whether the development in the Core Strategy can be delivered. We would suggest that the proposed development in Long Stratton is particularly at risk of not being delivered, and greater certainty of delivery could be achieved by locating this development in Wymondham. Proposed Alternative Strategy Significant savings could be achieved through reallocating the 1,800 dwellings currently apportioned to Long Stratton to Wymondham. Wymondham is the closest Main Town to Norwich, and the only one which would be linked by a Bus Rapid Transit service to Norwich. It is the most sustainable location for additional growth outside Norwich itself, and the sustainability Appraisal has already concluded that it is well suited to accommodate this level of additional development. We believe that the development already proposed at Wymondham, including 2,200 dwellings, will deliver much of the infrastructure which would be required to fund this larger allocation of 4,000 dwellings. While it may be that infrastructure such as the new junction and slipway on the A11, new schools and healthcare facilities would need to be further enhanced, it is difficult to imagine that the additional cost would be anywhere near as high as the £112 million which the GNDP have estimated would be required for the proposed development in Long Stratton. This approach would significantly increase the certainty that the proposed development and essential infrastructure could be delivered, and in this way help to make the Core Strategy sound. As we have noted above, this strategy would also result in a more sustainable form of development. The additional development at Wymondham would help to ensure a new Bus Rapid Transit service which would provide a high quality public transport link between Wymondham and Norwich. This would supplement the existing public transport links, which are already good, and help to create a modal shift away from private car use in new and existing residents. Additional development at Wymondham would also help to further enhance the current employment, services and facilities in the town, and help to create a more sustainable and self-sufficient town, which could also better provide for the needs of the surrounding settlements.

Joint Core Strategy Proposed submission Document

O - 11685 - 8352 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii, iii

11685 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary: Please see comments under policy 4. In addition, we note that this policy lists the transport infrastructure required to deliver growth. However, the policy makes no reference to other types of infrastructure required such as water infrastructure. It is not clear why this is the case.

Joint Core Strategy Proposed submission Document

S - 11695 - 8223 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11695 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Barratt Strategic/John Innes Foundation [8223]

Agent: CGMS Ltd (Mr Richard Atkinson) [7681]

Full Text:

Summary:

The Broadland, Norwich and South Norfolk Councils are currently preparing Local Development Frameworks (LDF) which will eventually supercede the adopted Local Plans. The Councils, together with Norfolk County Council, are consulting on the proposed submission for a Joint Core Strategy, which will form a key part of the LDFs.1.2 Building Partnerships is working with the John Innes Foundation and Barratt Strategic to promote the development of land in the south west of Norwich at Newfound Farm, Cringleford. The site lies within the undeveloped area bounded by Colney Lane, Round House Way, the A47 and the Norfolk and Norwich Hospital expansion lands.1.3 This representation supports the strategy for growth in the Norwich Policy Area as set out in Policy 9 and the inclusion of Cringleford as a location for a new or expanded community as set out in Policy 10. Newfound Farm is located in this growth area and is capable of delivering the proposed strategic allocation. However it is considered that, should the authority consider it appropriate, the scale of growth at Cringleford could be increased in order to make the most efficient use of the land and in accordance with the objectives of the Joint Core Strategy.1.4 A masterplanning exercise is under way which will demonstrate how Newfound Farm will integrate into the existing residential area, currently under development between Newmarket Road and Colney Lane, with the existing and proposed employment areas based around the Hospital and Norwich Research Park and with development being promoted by other parties on adjacent land. It will demonstrate the capacity of the site and confirm that it is capable of delivery at an early stage in the plan period, which will assist the authorities to meet their housing trajectory.PLANNING POLICY STATEMENT 1 - DELIVERING SUSTAINABLE DEVELOPMENT2.1 This policy statement sets out the overall aims and objectives of the Government in respect of Sustainable Development and the creation of sustainable communities.2.2 Paragraph 5 highlights that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by: making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life; contributing to sustainable economic development; protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities; ensuring high quality development through good and inclusive design, and the efficient use of resources; and, ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.2.3 The release of the Newfound Farm site for development is in accordance with PPS1, in that it would assist in the provision of housing to meet the needs of the area without compromising the natural and historic environment. The masterplanning exercise is being informed by studies including landscape, ecology and transport and the proposed layout of the site will respond positively to constraints which are identified. The site is bounded by development or strategic highways and would not therefore result in an intrusion into the surrounding countryside. It is located with good access to local jobs on the hospital complex and at the growing research park. The housing will be designed to minimise its carbon footprint, with, for example, construction in accordance with the higher levels of the Code for Sustainable Homes. The community will be well served by the existing high quality public transport services and will be planned to encourage walking and cycling. These factors will help to minimise carbon emissions, in accordance with the Climate Change supplement to PPS1.PLANNING POLICY STATEMENT 3 - HOUSING2.4 The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking: to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community; to widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need; to improve affordability across the housing market, including by increasing the supply of housing; to create sustainable, inclusive, mixed communities in all areas2.5 In support of its objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. The area enjoys excellent access to existing and planned employment areas and will support the developing community facilities in and around Cringleford.2.6 PPS3 stresses the need to make the most efficient use of resources, including land. It follows that where a sustainable location is identified, such as at Cringleford, this should be developed in a way which will deliver the maximum benefits (in terms of capacity) commensurate with environmental and other objectives.2.7 In identifying broad locations for development, Local Planning Authorities are required by PPS3 to consider the contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car. This is very much the case for this area which benefits from the high quality bus services which run to the city along Newmarket Road and which also serve the hospital and research park. Park and Ride facilities are also close at hand. PPS3 also requires local planning authorities to take into account any physical, environmental, land ownership, land-use, investment constraints or risks, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources eg water and biodiversity and complex land ownership issues. No significant environmental constraints have been identified on the land in question and there are no complex land ownership issues which could delay development.2.8 To be considered developable, PPS3 notes that sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged. PPS3 places great emphasis on deliverability. If allocated for development, the deliverability of the Newfound Farm development is not in doubt, given the aspirations of the current owners.3. REGIONAL PLANNING POLICY EAST OF ENGLAND PLAN3.1 The East of England Plan was published in May 2008 by the Secretary of State for Communities and Local Government. It covers the county of Norfolk, as well as Suffolk, Cambridgeshire, Essex, Hertfordshire and Bedfordshire. Together with

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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S - 11695 - 8223 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11695 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

relevant sections of the Milton Keynes South Midlands Sub-Regional Strategy, it constitutes the Regional Spatial Strategy (RSS) for the East of England. This RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term. In particular it seeks to reduce the region's impact on, and exposure to, the effects of climate change and to put in place a development strategy with the potential to support continued sustainable growth beyond 2021. 3.2 One of the key ambitions of this RSS is to allow the region to accommodate higher levels of growth in sustainable ways. It does this in a number of ways including by focusing development on a group of significant urban areas, termed Key Centres for Development and Change in Policy SS 3 'Key Centres for Development and Change', together with the policies for the individual centres. Norwich is one of the key centres. 3.3 Policy NR1 states that Norwich should be a regional focus for housing, employment, retail, leisure, cultural and educational development. Particular aims, reflecting its identification as a new growth point, should be to: provide for 33,000 net additional dwellings in the Norwich Policy Area (NPA) in the period 2001-2021 facilitated by joint or coordinated LDDs prepared by Norwich, South Norfolk and Broadland - Newfound Farm lies within the Norwich Policy Area and can make a contribution to this growth, with a planned number of at least 1400 dwellings; achieve a major shift in emphasis across the NPA towards travel by public transport - Newfound Farm is well served by existing bus services which provide high quality and frequent links to destinations across the city. Concentrating development in this location will encourage the use and development of the public transport network; provide for employment growth in the NPA, including the Norwich Research Park and the A11/Wymondham corridor - the former site will be within walking distance of Newfound Farm and the A11 corridor and city centre will be easily accessible by means of the existing high quality public transport services. 4. JOINT CORE STRATEGY SPATIAL PLANNING OBJECTIVES 4.1 The Joint Core Strategy pre-submission document sets out the spatial planning objectives for the Greater Norwich area. These are quoted below, together with an assessment of the proposed development's impact upon them : 4.2 To minimise the contributors to climate change and address its impact - a high level of accessibility by public transport and the adoption of low carbon design standards will minimise greenhouse gas emissions. The site is not susceptible to flooding and will not therefore be subject to climate change impacts. 4.3 To allocate enough land for housing, and affordable housing, in the most sustainable settlements - Newfound Farm will provide for a range of housing types and will contribute to the target for affordable housing. Increasing the capacity of the site, over that proposed in the pre-submission document, will make sure land is used efficiently and will permit a sustainable community to develop at Cringleford, with a full range of housing, employment and services grouped together. Good access to public transport and local jobs means that the residential development will be sustainable from the outset. 4.4 To promote economic growth and diversity and provide a wide range of local jobs - the site is immediately adjacent to the strategic employment area around the Norfolk and Norwich University Hospital and Norwich Research Park which provide a wide range of existing local employment opportunities. The Joint Core Strategy proposes further employment development in this area. If required, additional land could be made available for business use within the proposed development, but this is not considered to be a high priority given the availability of jobs in the area. Newfound Farm will also have high quality bus and rail links to other key employment sites in the Norwich Policy Area, including the city centre and Wymondham. 4.5 To promote regeneration and reduce deprivation - the creation of a prosperous, sustainable and inclusive community will be in the spirit of the objective and will help to improve the overall well being of the local community through provision of high quality housing stock and a range of community services. 4.6 To allow people to develop to their full potential by providing educational facilities to support the needs of a growing population - a new primary school and pre-school facilities will be provided as part of the project. Secondary education provision will be available at Hethersett, within easy reach of the proposed development area. Public transport links are available to access education facilities in the city centre and the higher education opportunities on the University campus and at Norwich Research Park. 4.7 To make sure people have ready access to services - as well as direct public transport access to the full range of services available in the city centre, the Newfound Farm project will enhance the established services in its local area through the provision of a local centre on Round House Way. This will be brought forward at an early stage in the development. 4.8 To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact - as previously noted, the proposed residential area is within walking distance of a range of employment opportunities and key facilities. Excellence in the provision of public transport and the facilities for walking and cycling will lessen car usage. 4.9 To positively protect and enhance the individual character and culture of the area - the project will not compromise this objective. Through the application of high standards of design, the character of the new community will be established. Significant areas of public open space, recreation facilities and access to the countryside will encourage participation in community activities. 4.10 To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value - the proposed development area has few natural features of interest, consisting of relatively recent tree belts and hedgerows of varying quality. The masterplan for the development will incorporate a landscape framework to complement that of the adjacent development and reinforce planting along the A47 corridor. In addition, a greenspace network will allow the creation of a range of habitats in an area which is currently of low ecological value and will contribute to the Green Infrastructure Priority Corridors identified in the Key Diagram. 4.11 To be a place where people feel safe in their communities - the design of Newfound Farm will give priority to walking and cycling with restricted access by private car to create a safer environment. In particular, safe routes will be developed between the residential development and the Hospital/Research Park. Key design concepts will include natural surveillance and the promotion of public safety in the design of open spaces. 4.12 To encourage the development of healthy and active lifestyles - a key component of the masterplan for the site will be a green space network providing accessible open space, and sports and recreational facilities as well as access to the Hospital/Research Park. This will complement those links included in the development brief for the extensions to the Research Park. The emphasis on walking and cycling will promote healthy travel choices. 4.13 To involve as many people as possible in new planning policy - significant new development has already taken place in the area between Colney Road and Newmarket Road and the development of the Hospital and continuing development of the Research Park has also affected the local community. In developing the masterplan for Newfound Farm, extensive consultation will be undertaken with all key stakeholders

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11695 Support

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and a dialogue will be opened with the local community. AN EXPANDED COMMUNITY AT CRINGLEFORD 4.14 Policy 10 of the pre-submission document identifies Cringleford as a strategic location for major growth which should be "masterplanned as attractive, well serviced, integrated, mixed use development using a recognised design process giving local people an opportunity to shape development." The initial masterplanning process has already commenced. As the process develops, community and stakeholder involvement will be based on Enquiry by Design principles. 4.15 The general principles to be adopted in designing the major growth locations, and the response of the proposed development are set out below. 4.16 To achieve the highest possible standards of design - the proposed new houses will also achieve at least 14 out of the 20 criteria associated with the 'Building for Life' standard, run by the Commission for Architecture and the Built environment (CABE) and the Home Builders Federation (HBF). In terms of sustainable design, all dwellings should comply at least with Level 4 of the DCLG's 'Code for Sustainable Homes'. 4.17 To address current service and infrastructure deficiencies to benefit existing communities - implementation of the project should help to bring forward the provision of local centre facilities and services and contribute to the improvement of local highways infrastructure. 4.18 To deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure - distinctive design is one of the criteria associated with the 'Building for Life' standard. Emphasis is being placed on the provision of green infrastructure to provide a framework for the development and strategic green corridors linking the Newfound farm area to the Yare valley. 4.19 To provide for a wide range of housing need - the Newfound Farm area will provide a full range of house types for all stages of life, with housing for those with special needs incorporated in the mix and will contribute to the target for affordable housing. 4.20 To achieve a high level of self containment while integrating well with neighbouring communities - if a truly sustainable community is to develop in the south west sector of the city, then the project must be fully integrated with the existing development at Cringleford and with the emerging proposals for the Norwich Research Park. The promoters will work closely with the authorities and the developers of adjacent land to ensure that proper integration occurs. 4.21 To achieve a major shift away from car dependency and be designed around walking and cycling for local journeys and public transport for longer journeys - the project is based around the core bus route which the Norwich Area Transportation Study has identified in this sector of the city. It is also close to the bus rapid transit corridor on Newmarket Road. Priority in the masterplan layout will be given to walking and cycling routes. 4.22 To include Sustainable Drainage Systems (SuDS), on site or nearby renewable energy generation and water saving technologies - SuDS will be incorporated in the masterplan layout to add biodiversity value to the green infrastructure and prevent downstream flooding. In addition renewable energy generation on site is being investigated. 4.23 To include new or expanded education provision, local retail and other services, community and recreational facilities, small-scale employment opportunities and primary healthcare facilities - the project will make provision for pre-school and primary education and help to bring forward proposals for retail and healthcare facilities within a local centre. Recreation facilities will be provided as part of the green infrastructure. 4.24 To ensure high quality telecommunications and adequate energy supply and sewerage infrastructure - the project will be fully serviced to the latest standards. 4.25 With specific reference to Cringleford, Policy 10 of the pre-submission document proposes : at least 1,200 dwellings - initial studies show that at least 1400 dwellings could be provided as part of the Newfound Farm project. expansion of the existing services nearby - the project will help to bring forward proposals for local service provision. new pre-school provision and a primary school - this will be provided as part of the project. enhanced bus services to the city centre with potential for bus rapid transit also serving Wymondham, Hetherset and Norwich Research Park - the project is located on the core bus route which can provide direct links to all the stated areas. safe and direct cycle routes to the city centre, Hethel, Norwich Research Park and the Hospital - the project will be linked in to the city's cycle route network and the masterplan layout will allow for safe routes between the residential areas and the Research Park and the Hospital. green infrastructure to provide enhanced public access to the countryside and the Yare valley - the masterplan for Newfound Farm will incorporate green infrastructure to provide links to the countryside west of A47 and to the parkland of the University campus and Yare valley. 5. PRELIMINARY MASTERPLAN 5.1 Newfound Farm lies within an undeveloped area bounded to the west by the A47 Norwich southern bypass; to the south by Newmarket Road; to the east by Round House Way; and to the north by Colney Lane and the Hospital expansion land. It is shown edged red on the attached plan. 5.2 The site is currently mainly in agricultural use and extends to about 53ha. Significant residential development has recently taken place to the east of Round House Way. This includes provision for a local centre, not yet developed. 5.3 The land is solely owned by the John Innes Foundation. 5.4 South Norfolk District Council proposes that a "spatial vision plan" be prepared for land at Norwich Research Park which includes the land surrounding the Norfolk and Norwich University Hospital and extending as far as the A47 and B1108 Watton Road. It also encompasses the main university campus and Colney Hall. This area has been identified in the Core Strategy submission document as a strategic location for the expansion of health, higher education and science park activity. The development at Newfound Farm will be designed to complement the expansion of the Norwich Research Park, and other proposals for development served by Round House Way. It will be important to ensure consistency between the various proposals if a sustainable community is to develop in this sector of the city. 5.5 The masterplanning exercise for Newfound Farm is under way. The purpose of the masterplan, underpinned by a range of specialist studies, is to demonstrate the key principles to be adopted in developing the site and its capacity, taking account of known physical and policy constraints. It will also confirm how the scheme can be delivered in accordance with the requirements of the emerging Greater Norwich Joint Core Strategy. The masterplan will continue to be developed in consultation with key stakeholders and will be used to make a constructive contribution to the preparation of the Site Specific Policies and Proposals section of the South Norfolk Local Development Framework. 5.6 Taking account of constraints, already identified by the team, and assumptions relating to density and mix, a preliminary land budget demonstrates that the site is capable of providing around 1400 dwellings (at 40 dwellings/ha) together with a range of education and community facilities. Higher density development could increase the number of units to over 1700. As indicated earlier, the continuing masterplanning exercise will refine the development proposals and housing capacity. 6. CONCLUSION 6.1 This representation supports the identification of the Cringleford area as one of the locations for major growth in the Greater Norwich area. Its development would be entirely consistent with the spatial planning

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objectives of the Joint Core Strategy. Development of the Newfound Farm site will be critical to delivering this growth scenario. The initial findings of a masterplanning exercise has indicated that the Newfound Farm site could alone meet the proposed strategic allocation of "at least 1200 dwellings" included in the Joint Core Strategy and could accommodate additional dwellings in excess of 1200 units, if considered appropriate. This would make more efficient use of the land resource consistent with the aims and objectives of the Joint Core Strategy and national and regional planning policies.

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S - 11705 - 8363 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11705 Support

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary:

We agree with Policy 9 and the fact that it is envisaged that much of the new development will be focused on the urban area of Norwich, including urban fringe parishes such as Costessey. The existing suburbs and immediate urban/rural fringe are a key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the link between the city centre and the surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated strategy. In the context of the Costessey area, an extension of the existing Lodge Farm development area would enable elements of Policies 9 and 10 of the PSD to be addressed. For example, the extension of the Lodge Farm site, in conjunction with improvements to the A47 Longwater interchange, provides the opportunity to enhance the Dereham Road gateway to Norwich. The PSD refers to the strategic employment location at Longwater and the anticipated significant enhancement of public transport between the City Centre and Bowthorpe/Costessey/Longwater. Given those important elements of the spatial strategy, we consider that the preferred growth option will secure a distribution of new housing which reflects the spread of strategic employment areas described in Policy NR1 of the East of England Plan and the transportation enhancements foreshadowed in the JCS. We have noted that paragraph 5.46 of the PSD suggests that the JCS requires an increase in capacity at the A47 Longwater junction. The GNDP will be aware of the fact that an improved junction layout in this general area will be achieved by utilisation of part of the proposed Lodge Farm extension land. The plan at page 69 of the Public Consultation of March 2009 showed a strategic growth location between the present Lodge Farm housing site and the A47. We support that clear policy guidance and contend that the proposed extension of the existing Lodge Farm development area is the most appropriate response to development in the Costessey area as it represents a development form arising at the edge of the existing built-up area of Norwich. Given the strategy for the Norwich area established in the East of England Plan, the JCS should acknowledge that the key issue is the delivery of new housing in response to the identification of Norwich in Policy SS3 of the EEP as a Key Centre for Development and Change. Suitable sites at the edge of the existing built-up area of Norwich are well placed to address this strategic objective. The allocation and implementation of the proposed larger development areas will encompass a number of years. That being the case, it is important to ensure that an adequate supply of housing land is maintained in the NPA, in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the NPA, we do not consider that the housing land supply in the short/medium term can be achieved purely by means of the development of previously developed land or reliance on a limited number of large urban extensions. A number of medium-size urban extensions, at the very edge of Norwich, should be brought forward to accommodate new housing in the short/medium term to ensure that the growth agenda for Norwich is not compromised in its initial phase. The GNDP will be aware of the fact that our clients are presently implementing development at Lodge Farm at the edge of the built-up area of Norwich. We consider that the extension of that site to the west would address the strategic spatial objectives of the JCS and provide an opportunity for new housing to be constructed in the short term. Our clients are already at present on site and an expansion of the existing area could readily be achieved once the appropriate planning permission have been secured, enabling continuity in the delivery of housing. Paragraph 3.10 of the East of England Plan states that the main strategy is to concentrate development at the regions cities and other significant urban areas, including selected market towns. Policy SS3 of the EEP defines Key Centres for Development and Change. Norwich is identified there in as a KCDC. New development in the NPA will be focused on the urban area of Norwich, including urban fringe parishes such as Costessey. Costessey is physically part of the built-up area of Norwich, including urban fringe parishes such as Costessey. Costessey is physically part of the built up area of Norwich and its identification as a location for further growth implements Policies SS3, H1 and NR1 of the East of England Plan. Costessey is appropriately identified in the JCS as an element of the preferred growth option, Our clients particularly support the identification if a strategic growth location at Costessey between the A47 and the built-up area of Norwich. Paragraph 13.67 of the EEP acknowledges the economic strengths of the Norwich area and states that there are opportunities to build upon those existing prospects. Policy NR1 of the EEP requires that the strategy for employment growth should focus on specific locations, including Longwater (business park uses). When these strategic spatial planning objectives are considered, it is clear that Norwich is the primary focus for the accommodation of new housing and employment opportunities. That being the case, Costessey is an apposite and sustainable location for further housing, being well related to the urban area of Norwich and situated in close proximity to important existing employment areas. Costessey has a higher rating in the settlement hierarchy than Easton and in the circumstances, the JCS should make a distinction between Easton and Costessey, noting that the latter represents a more sustainable focus for further housing. Further housing at the proposed Lodge Farm extension can assist in a positive manner in the provision of facilities such as enhanced public transport and improved bus/cycle links. Lodge Farm is better related to Longwater and the Bowthorpe employment area than Easton. A careful consideration of the strategic planning merits of Costessey leads to the conclusion that it is a more appropriate location for growth than Easton which is physically separated from Norwich by the A47 and the Royal Norfolk Showground. The implementation of a sound spatial strategy, reflecting the policy base provided by the EEP would recognise the advantages of Costessey. Policy 9 indicates the Costessey area is expected to accommodate 1,000 dwellings. We would observe that such a figure represents the minimum to be constructed, following the advice given at Policy H1 of the EEP. Accordingly we support the wording of policy 9 and para 6.5 of the PSD. As Costessey plainly occupies a more sustainable strategic location than Easton, the JCS should make clear the fact that any housing to be provided at Easton will be residual figure once

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S - 11705 - 8363 - Policy 9: Strategy for growth in the Norwich Policy Area - None

11705 Support

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the capacity of land at the western edge of Norwich has been maximised.

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O - 11719 - 8618 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11719 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

Policy 9: Strategy for growth in the Norwich Policy Area

Objection is made to the proposed growth strategy for the Norwich Policy Area on the grounds that it is not the most appropriate strategy when considered against the reasonable alternatives and for this reason the JCS is considered to be unsound. Infrastructure Provision Part of this objection is based upon the acknowledged deficiency in committed service/infrastructure provision which was accepted to be the case at the time of the Regulation 25 Consultation, and remains the case in respect of this current consultation, i.e. there is no commitment from any infrastructure providers that growth can be accommodated within defined timescales. This raises questions over the deliverability of the strategy. The PINS report (February 2009) raised this as a critical issue needing to be addressed and we can see no advancement having been made in respect of this issue since. Indeed the PINS report stated (paragraph 15): "...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...For larger schemes, what is the expected phasing and how does this relate to the delivery of infrastructure..." There is no evidence put forward in the JCS as to when the strategic sites are programmed to be delivered. Appendix 7 of the document lists "estimated delivery dates" which in most cases relate to lengthy time bands with no real meaning. This section of the Proposed Submission Document contains a preamble including the following: "...The list of infrastructure is intended to identify the strategic projects required to facilitate development promoted in this JCS. It is early work and is not intended to be an exhaustive list of the entire infrastructure that will be needed by 2026..." The PINS report indicated that more detailed programming than is provided in the Proposed Submission document needed to be in place at submission. Clearly this is not the case and the JCS, as currently expressed, is therefore unsound.

South Norfolk part of the Norwich Policy Area

There are concerns over the way in which strategic growth options have been arrived at within the South Norfolk part of the Norwich Policy Area and it is questioned why a similar approach to that taken within Broadland has not been adopted towards assessing the capacity of the area bordering the Norwich Urban area, for the purposes of accommodating growth. The result is that whilst a major urban extension has been decided is appropriate to the north east of the city, despite its dependency upon the delivery of a major road proposal, in South Norfolk, despite the existence of major trunk roads serving the area, providing access, a similar approach to an urban extension has been rejected. The PINS report (February 2009) made reference to this at paragraph 21 where the Inspector asked why the retention of strategic development gaps was an overriding concern as urban extensions are considered an appropriate way of accommodating new growth. Further, the letter from GO-East dated 28 April 2009 to the GNDP also made reference (paragraph 6) to the need to demonstrate that the proposed strategy is the most appropriate when considered against reasonable alternatives, so even at that relatively late date of April 2009 the Government Office had concerns about this issue. It is noticeable that in the Broadland area of the NPA, a revised landscape character assessment was undertaken in connection with allocating the proposed growth areas at Old Catton, Sprowston, Rackheath and Thorpe St. Andrew. This has not been the case in South Norfolk. In September 2009 a topic paper was produced by the GNDP (Strategy to Accommodate Major Housing Growth in the Norwich Policy Area) which purported to justify why a significant urban extension was considered inappropriate within the South Norfolk part of the NPA. This "justification" came long after the preferred option had been selected, and its timing cannot therefore be said to have informed the choice of location. South Norfolk Council Annual Monitoring Report 2007-2008

At the time of writing this document is the latest available Annual Monitoring Report (AMR) from South Norfolk. The AMR is designed to be a regular check on the operation of planning policies in new or amended LDDs. It is noted that previous AMRs have adopted a similar approach to that set out here. On the issue of Landscape and Biodiversity, the AMR states: "...We are maintaining the integrity of the 'open land' separating settlements in the Norwich area..." In respect of areas of open land which maintain a physical separation between settlements in the Norwich area, expressed in Local Plan policy ENV2, the AMR states that: "... it is intended to protect and conserve the local landscape character, the setting of urban areas, towns and villages and historic setting of the city of Norwich by preventing 'inappropriate development' in areas of open land that maintain a physical separation between settlements in the Norwich area..." The conclusion on the present operation of policy ENV3 is that it remains important that any development activity that could impact upon the objectives of the policy continue to be identified and rigorously assessed when determining planning applications. The AMR contains a section detailing 'Points for Action'. This acknowledged that the areas defined by policy ENV2 are subject to a modest but continuing pressure for development, and that this requires careful control to ensure that it does not result in the loss of openness or begin a process of coalescence. Monitoring of the policy was also recommended in light of the possible need for revision or refinement during the Local Development Framework process. It states: "The preparation of a Joint Core Strategy between Broadland, Norwich and South Norfolk Councils will inevitably place considerable pressure on vulnerable and finite countryside and landscape assets within the Norwich Area...longer term decisions on growth locations and environmental protection as part of the Joint Core Strategy could have a significant impact upon those 'areas of open land which maintain a physical separation between settlements in the Norwich area'..." A further policy - ENV6 operates to maintain the landscape setting of the A47 Norwich Southern Bypass. This policy originated from Policy N6 of the Norfolk Structure Plan which is now defunct. It came about as a result of the failure of the Secretary of State to permit the establishment of a green belt around Norwich in the 1970s. The AMR concludes by indicating that Policy ENV6 - the southern bypass landscape protection zone plays an important role in focussing development within existing development limits and village boundaries, whilst preserving the landscape setting of the southern bypass and

Joint Core Strategy Proposed submission Document

O - 11719 - 8618 - Policy 9: Strategy for growth in the Norwich Policy Area - i, ii

11719 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

the historic setting of the City of Norwich. A point for action in respect of this policy is stated to be the continued need and justification for this designation which was to have been examined as part of the emerging Joint Core Strategy. As will be seen, this has not been carried out in the context of the JCS and the selected growth locations within South Norfolk. The topic paper, referred to above states that the reliance on a second large urban extension within the South Norfolk NPA would raise concerns over whether this would increase the risks to the overall delivery of housing yet it does not indicate why. This is strange in an area where completion rates have been running at higher levels than in the Broadland NPA where it is held that concentration of development within an urban extension, either side of a yet to be constructed road, will more likely sustain the levels of infrastructure required to make the development viable. In South Norfolk, however, the proposal to spread development into a larger number of smaller locations will significantly reduce the possibility of providing economic public infrastructure and services, an important example of this being the ability to deliver Bus Rapid Transit (BRT) at an affordable level, and in an area (the A11 corridor) where the most efficient service exists, which is capable of being expanded having the road capacity available to do so. Long term planning, as in this case, should not be looking at short term market conditions, yet the topic paper refers to the speed at which development can be progressed in the current slow housing market, rather than whether investment in employment opportunities might raise the need for additional housing. In terms of landscape character, the topic paper deals with this in Appendix 3. It states that features such as the Yare Valley and the A47 Norwich Southern Bypass and the Norwich/Cambridge rail line mark a break between the urban edge and the wider rural area. Generally, the approach taken in South Norfolk has been to preserve past patterns of growth but there has been no examination of whether that remains relevant to current needs, as set out in the east of England Plan which, as has been acknowledged, has set unprecedented levels of growth for the Norwich Policy Area. As outlined above, the latest AMR indicated the need to review whether Policy ENV6 remained relevant and justified in the light of the need to accommodate these unprecedented levels of growth. The topic paper does not address this in any constructive way. Landscape Character Assessment The topic paper, at section 2.3, refers to the landscape character assessment carried out in 2001, in preparation for the South Norfolk Local Plan. That is now increasingly becoming a historic document and whilst it may have saved policies they will be replaced by the Joint Core Strategy when adopted. In approving saved policies in existing development plans, the Secretary of State made clear that this was on the basis that there would be no guarantee of these policies being allowed to be carried forward into the new LDF process. South Norfolk Council can therefore no longer rely on such policies remaining relevant going forward unless they have been objectively re-assessed. The topic paper acknowledges that the A47 Norwich southern bypass landscape protection zone is a planning tool and that the A47 has no intrinsic landscape value. Policy ENV6 is used to prevent "inappropriate" development occurring within the zone. The topic paper describes the policy as protecting the landscaping setting of the road and describes the road as having been designed to fit into the landscape. However, in Section 5 of the same topic paper, which evaluates the settlements of Colney and Cringleford, it states that the A47 Norwich Southern Bypass has a major impact on the landscape. These two statements are incompatible. Techniques used in Landscape Character Assessment have moved on since the original South Norfolk exercise was carried out in 2001 and it should have been anticipated, as in the case of Broadland, that a review of the continuing relevance of the character assessments of the area would need to be carried out prior to determining the location of significant growth options. At the least, this should have consisted of a study to determine the capacity to which the existing landscapes are capable of accommodating development without undue detriment and an indication given as to how much development might be appropriate. This, in our view amounts to consideration of a 'reasonable alternative' which should have been carried out in as objective a manner as possible prior to the selection of potential growth options. If reliance is being placed upon the work done for the South Norfolk Local Plan then clearly an up to date evidence base does not exist to assess this option and it cannot therefore be ruled out as unacceptable alternative. The extent to which Policies such as ENV2 and ENV6 can continue to be relied upon has to be judged in the light of more recent developments and proposals. The proposals to develop land at Roundhouse Way for housing, together with South Norfolk Council's plans for extending the Norwich Research Park and, potentially the hospital, have all resulted in development extending beyond the Yare Valley and have all, to a greater or lesser extent, impacted upon the bypass landscape protection zone. To the extent that a majority of the land to the east of the A47 at Cringleford and Colney is proposed to be developed, the beginnings of an urban extension have already commenced by development "leapfrogging" the River Yare and impacting upon Local Plan Policy ENV6 - the bypass protection zone. In addition to this developments that have been permitted by South Norfolk Council at Longwater, Costessey and at Trowse have cumulatively eroded the bypass landscape protection policy over time to the extent that its continuing relevance now needs to be reviewed in the context of developing this JCS. It is our contention that unless and until an objective view is taken of reasonable alternative development scenarios within South Norfolk, this element of the JCS is unsound and does not meet the tests set out either in PPS12 or the Soundness Guidance published by The Planning Inspectorate, relating to Local development Frameworks. The current Strategy for Growth in the Norwich Policy Area is therefore not justified.

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O - 11723 - 8363 - Policy 9: Strategy for growth in the Norwich Policy Area - ii

11723 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

Respondent: Taylor Wimpey Developments & Hopkins Homes Agent: Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary:

REFERS TO KEY DIAGRAM Taylor Wimpey developments and Hopkins Homes do not consider that it will be possible to bring forward larger-scale development areas quickly. Given that proposition, it is entirely appropriate for the Proposed Submission Document to recognise that the delivery of the growth agenda must incorporate a mixture of large scale and small/medium scale development locations, dispersed around the Norwich area in suitable/sustainable locations. It is clear that the Costessey area is extremely well related to the strategic employment area at Longwater and the employment opportunities at Bowthorpe. It is equally relatively close to the Norwich Research Park and adjoins the Sainsbury's superstore and related retail facilities. The proposed Lodge Farm extension is served by a public transport corridor and is well located relative to the A47. Given the general intention of the Joint Core Strategy to seek a closer relationship between new housing, jobs and services. Costessey is a sustainable location, a factor that provides strong support for the proposition that new housing be provided off Dereham Road, as an extension of the existing Lodge Farm development. We have noted that the Longwater strategic employment location was shown on the plan at page 69 of the Public Consultation: Regulation 25 (March 2009) which illustrates the favoured growth option. The area at the western edge of Norwich exhibits strong sustainability credentials. Medium-size urban extensions, such as the proposal regarding land to the west of the existing Lodge Farm development, can play a vitally important role in the short/medium term to generate the required initial momentum for the Norwich growth area. The plan at page 69 of the Public Consultation also described a strategic growth location between the A47 and Lodge Farm. Whilst we assume that the Key Diagram is intended to be diagrammatic in its representation of potential growth locations, the major housing growth to the west of Norwich would appear to be directed to a location to the south of Dereham Road and to the west of the A47 in the general area of Bawburgh and the Royal Norfolk Showground. That being the case, an interpretation of the Key Diagram is that the proposed urban extension to the west of Norwich will arise at Easton/Bawburgh, not Costessey. The plan on page 769 of the Public Consultation (March 2009) presented a clearer indication of the favoured growth option, incorporating an urban extension of Norwich/Costessey to the south of Dereham Road and to the east of the A47. Such a policy outcome would represent a physical expansion of the existing built-up area of Norwich whilst the indicative focus shown on the Key Diagram of the PSD suggests that new housing will be accommodated at Easton/Bawburgh which is a less sustainable location than the edge of Costessey. The PSD is unsound in that it exhibits an inconsistent approach to the content of the Key Diagram and the Proposals map. Map extract No. 2 shows three asterisks identifying a proposed growth location north of the A47, near the River Tud, whilst the Key Diagram displays a major housing growth notation to the south of the A476, close to Easton/Bawburgh. Our clients are concerned that the equivocal approach to the location of growth at the western approach to Norwich may have its origins in the Topic Paper on the strategy to accommodate growth in the NPA. Whilst the Topic Paper acknowledges that the options for large-scale growth "are focussed on extensions to Lodge Farm/Bowthorpe and at Easton", we object in the strongest terms to the comment at paragraph 5.2 of Appendix 3 of the Topic Paper that "to the east is the Norfolk Environmental Waste Services waster disposal and recycling facility, which acts as a constraint to further residential development in the immediate vicinity." This observation represents a fundamental misunderstanding of the present policy framework provided by Policy WAS7 of the Norfolk Waste Local Plan and its implications for the JCS and the Norfolk Minerals and Waste Development Framework. Paragraph 4.2.16 of the Norfolk Waste Local Plan notes that waste management facilities "need to be protected from potential development in the neighbourhood which could prejudice their future use." Local planning authorities "will be requested to consult the County Council on certain planning applications" within 250 metres of a landfill site. Paragraph 4.2.16 clearly defines this categorisation as a "consultation area around landfill sites." Policy WAS7 of the NWLP states that "local planning authorities will protect from incompatible development, as far as practicable, major existing and proposed waste management facilities shown on plan 2 and any sites where planning permission for such facilities is subsequently obtained." A consultation area is defined around the Costessey landfill site which is designated in the NWLP as Site No. 8. The NWLP is clear in its definition of a consultation area. Paragraph 6.1 of the Waste Site Allocation DPD: Further Issues and Options (Preferred Options) states that the operation of waste management sites "could be threatened should new non-waster developments be permitted in the vicinity. This might occur for example if new housing development is proposed and permitted nearby, which could affect the ability of a waste management site to increase its capacity, to take new w3aster streams, or to employ new technologies. The sites therefore need to be identified and be subject to safeguarding policies in the Core Strategy and Development Control DPD." Our clients consider that the approach exhibited at paragraph 6.1 is different to the designation of consultation areas around landfill sites established in the Norfolk Waste Local Plan. The use of the term 'safeguarding' implies a resolute protection of any existing facilities and an inflexible prohibition of other land uses in the general vicinity. Our clients contend that such a conclusion exceeds the objectives of the consultation area around landfill sites established in the Norfolk Waste Local Plan. Hopkins Homes and Taylor Wimpey Developments recognise that the County Council wishes to have the opportunity to consider whether the operation of waste management facilities will be undermined by incompatible development. However, we would observe that the technical processes now operating within waste management facilities are significantly more advanced than was the case when the NWLP was prepared, Paragraph 6.1 of the Further Issues and Options (Preferred Options) rightly refers to the ability of a waste management facility to employ new technologies. Those processes are sophisticated in their application and will have a direct bearing upon the extent to which new development can be permitted within a consultation area. The website of Norfolk Environmental Waster Services Ltd proclaims the inherent technological proficiency of the Costessey Recovery Park. The website

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O - 11723 - 8363 - Policy 9: Strategy for growth in the Norwich Policy Area - ii

11723 Object

CHAPTER 6 Policy 9: Strategy for growth in the Norwich Policy Area

asserts that NEWS "is a leading waste management company in East Anglia and is at the forefront of innovative new approaches to the handling and management of waste. The website further maintains that "the Costessey Recovery Park is the future of waster management". NEWS describes the Recovery Park as being "one of the most technologically advanced in Europe" The Recovery Park comprises the Waste Recycling and Transfer Centre and, when constructed, the new Mechanical Biological Treatment Plant. Our clients do not consider that the presence of the Costessey Recovery Park acts as a constraint to further residential development to the west of Lodge Farm. Norfolk Environmental Waste Services Ltd contends that the facility is one of the most technologically advance in Europe. Innovative new approaches are applied to the handling and management of waste by NEWS and such a resourceful/inventive enterprise should not be incompatible with new housing on the southern side of Dereham Road.

Joint Core Strategy Proposed submission Document

S - 11176 - 7620 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11176 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: IE Homes & Property Ltd (Mr Ed Palmieri) [7620] **Agent:** N/A

Full Text: 1800 new homes at Long Stratton taking a whole settlement approach to development, with the bypass, a good bus service on A140 with further opportunities for improvement of that, including junction improvements at A140 / A47 is sustainable. It also offers opportunities for the provision of 1800 new homes on smaller sites in the South Norfolk NPA along the A140 which will benefit from the growth at Long Stratton.

Summary: 1800 new homes at Long Stratton taking a whole settlement approach to development, with the bypass, a good bus service on A140 with further opportunities for improvement of that, including junction improvements at A140 / A47 is sustainable. It also offers opportunities for the provision of 1800 new homes on smaller sites in the South Norfolk NPA along the A140 which will benefit from the growth at Long Stratton.

Joint Core Strategy Proposed submission Document

O - 11200 - 8504 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11200 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Yare Valley Society (John Elbro) [8504]

Agent: N/A

Full Text:

Representation to be made on contents on p 65 of the Strategy:Policy 10: Locations for major new or expanded communities in the Norwich Policy AreaCringlefordThis location is dependent on expanded capacity of the A11/A47 Thickthorn junction and will deliver modest growth to the existing village to include:* at least 1,200 dwellingsRepresentation:The increase in number of dwellings by "at least 1200" will have a significant impact on the local Green Infrastructure requirements. This is recognized by a subsequent paragraph in the Cringleford Section:"Green infrastructure to provide enhanced public access to the countryside and the Yare valley"What is not recognized is that an inappropriate choice of locations for the new dwellings could itself be a threat to the Yare Valley Corridor in terms of its ability to provide recreational space, and its ability to sustain a wildlife corridor.In consequence, the document is not sound because while stating to provide enhanced access to the Yare Valley, it gives no assurance that the location of the dwellings will not damage the Yare Valley Corridor itself.Moreover, failure to include a safeguard that relates particularly to the Cringleford development could result in dwellings being located such as to conflict with the enjoyment of other stated policies e.g. Items in Policy 12 relating to the Yare ValleyIn terms of the number of dwellings, it is unsatisfactory to claim "modest" growth, when no limit has been placed on the growth by the number of "at least" 1200.In addition, the protection of the Yare Valley as a 'green corridor' becomes even more important with increasing pressures for development on both sides of the valley. The strategy should recognise that the potential for development in Cringleford is constrained by the valley to the east and by the A47 and its landscape zone to the west and it has not been demonstrated that Cringleford can accommodate a further 1200 houses without conflicting with these environmental constraints." In consideration of the points above, the statement for Cringleford should be changed to read:CringlefordThis location is dependent on:expanded capacity of the A11/A47 Thickthorn junctionprotection of the Yare Valley Corridor.The location will deliver modest growth to the existing village to include:* up to 1200 dwellings.... etc

Summary:

An inappropriate choice of locations for the new dwellings could be a threat to the Yare Valley Corridor in terms of its ability to provide recreational space, and its ability to sustain a wildlife corridor.In addition, there are increasing pressures for development on both sides of the valley. The strategy should recognise that the potential for development in Cringleford is constrained by the valley to the east and by the A47 and its landscape zone to the west and it has not been demonstrated that Cringleford can accommodate a further 1200 houses without conflicting with these environmental constraints."

Joint Core Strategy Proposed submission Document

S - 11248 - 8547 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11248 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

We support the principle of growth at Easton Easton College, the Royal Norfolk Agricultural Association (RNAA), The Diocese of Norwich and Easton Estates have been working together with Easton Parish Council to develop a vision for the expansion of the settlement of Easton and to improve the educational facilities at the College. It is the collective view of the partners that a moderate increase in the size of the village will enhance its form and character, support additional facilities, provide for better traffic circulation and improve services. In short the partners consider these proposals as a means to create a more attractive, sustainable and viable village community. The landowners have been working together to produce a masterplan for the growth of the village. The masterplan demonstrates that modest growth, c1,000 homes can be delivered at Easton over the plan period and that there are no insurmountable obstacles to delivery. The partners masterplan for Easton:- Demonstrates how at least 1,000 new homes can be delivered- Enhances local services through an enhanced village centre, including additional primary school accommodation and opening up the College's sports facilities for greater public use- Supports the development of a bus rapid transit system to the city centre- Enhances bus and cycle links to the city centre, Norwich Research Park Easton College and to other facilities- Provides improved cycle and pedestrian access to employment sites- Removes college traffic, including heavy service vehicles, from the village through the delivery of a new access route to the college

Summary:

Easton College, Royal Norfolk Agricultural Association (RNAA), The Diocese of Norwich and Easton Estates have been working together with Easton Parish Council to develop a vision for the expansion of the settlement of Easton and to improve the educational facilities at the College. It is the collective view of the partners that a moderate increase in the size of the village will enhance its form and character, support additional facilities, provide for better traffic circulation and improve services. In short the partners consider these proposals as a means to create a more attractive, sustainable and viable village community.

Joint Core Strategy Proposed submission Document

O - 11274 - 1401 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11274 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: **Wymondham Town Council (Mr Trevor Gurney)** Agent: **N/A**
[1401]

Full Text:

Summary:

The Town Council has now considered the Joint Core Strategy and in relation to its soundness would like to make comments on housing, transportation, education, infrastructure, retail and legal compliance. Housing The Council's view in respect of the proposed numbers of new dwellings is well documented in our previous letters and these views are unaltered. The strategy contains contradictions e.g. between page 9 which states "Concentrating all growth on the A11 corridor would result in the excessive expansion of Wymondham and Hethersett, altering not only the character of the settlements themselves but also eroding the degree of separation between settlements and Norwich" and Page 22 which states "Other large-scale growth will take place at the extended communities...Wymondham". It is important that the green belt between Wymondham and Hethersett is maintained by preventing ribbon development along the B1172. There is a lack of clarity regarding the rate, extent and timings of proposed residential and retail/commercial development, indeed is the proposal of 2200 homes a maximum or a minimum that the Town can expect. Only this week a planning Inspector has allowed permission for a further 323 new residences and we still seek clarification that these will be included within the planned 2200 dwellings. It would therefore seem that some aspects of the strategy have already been prejudiced by existing and impending planning decisions. Transportation Whilst supporting the principles outlined in the Norwich Area Transport Strategy (NATS) which incorporates the bus rapid transit proposals concerns were expressed about its ability to cope with the anticipated volumes of passengers' given the proposed expansion levels. Provision of detail may well result in the implementation of the strategy becoming physically impossible. Education Given that Wymondham has been identified for major expansion and has been allocated the largest number of new properties in South Norfolk it was felt that reference to additional education provision was sparse in detail. (Pages 64.67 & 131 refer). Concern was raised that provision of new schooling is scheduled for with a delivery date of 2021 whilst residential properties will start to be built from 2014. Infrastructure The Council is adamant that this must go hand in hand with development and be in place to maintain quality of life for residents. Retail As an historic Town we would trust that any town centre expansion plans would be sympathetic and of a high quality. Suggested development is vague and lacking in detail, nature and location. Legal Compliance The Council feel that it is not qualified to judge its legal compliance although members believe that there has been adequate consultation, and as such we would refer you to our previous responses and confirm that we have not changed our views. Whilst we accept that a lot of work has gone into preparing the strategy there are still many vague points which need greater detail and clarification before a reasoned debate can take place about its soundness and relevance to Wymondham.

Joint Core Strategy Proposed submission Document

S - 11286 - 2373 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11286 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Persimmon Homes (Anglia) [2373]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

This policy sets out the broad strategy for growth in the Norwich Policy Area. We support the view that a minimum of 21,000 dwellings needs to be allocated across the area and in particular that 1,800 dwellings should be allocated at Long Stratton. Whilst it is envisaged that this would form a major urban extension to the town and also provide funding towards the provision of the Long Stratton bypass, it is important to note that opportunities should also be taken for infill development in the town where it can be demonstrated that this would add to the sustainability of the settlement. This is why we agree with the approach that the 1,800 dwellings should be a minimum target to be achieved. We would support the statement in paragraph 6.13 that Long Stratton has a good range of local jobs, services and other community facilities. In order to fund the proposed Long Stratton bypass it is crucial that sufficient development is allocated to support delivery of the bypass. Therefore infill development should also be permitted within Long Stratton. Another key aspect is the timing linkage between the delivery of the bypass and the delivery of the housing. Paragraph 6.17 of the supporting text to this policy states that: "There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth." Paragraph 6.18 goes on to state that: "...Completion of a bypass is a pre-requisite for the scale of growth identified in Long Stratton." Whilst we acknowledge that this will be the case for strategic growth at Long Stratton, it should not be used to prevent much smaller sites coming forward that will not have a significant impact on the road network. Indeed, such sites should be permitted to be developed in advance of the major growth at Long Stratton in order to ensure continuous housing delivery in the early years of the plan period.

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O - 11325 - 6826 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11325 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: CPRE Norfolk (Mr James Frost) [6826]

Agent: N/A

Full Text:

Summary: The major development locations will just not see a major shift away from car dependency. Instead the JCS priority in cost and timescale to delivery is highly weighted in favour of road programmes and use of the car. We would prefer a much clearer strategic approach to encourage walking and cycling for local journeys and public transport for longer journeys. The level and rate of housing growth is not feasible, as well as not being desirable in relation to jobs and infrastructure (hard and soft). The key dependencies summarised in paragraphs 6.18, 6.19 and 6.22 are simply not deliverable. This is illustrated by the data in appendix 7 for water (potable and waste), electricity, gas and transportation. Norfolk County Council also point this out forcefully in their response to EERA for the recent RSS Review (2011 to 2031).

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O - 11340 - 8570 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11340 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd supports Hethersett's inclusion as a strategic growth location in Policy 10. However, Hethersett Land Ltd objects to the restriction on the scale of growth at Hethersett to 1000 dwellings. Hethersett Land Ltd contends that the restriction of 1000 homes at Hethersett suggested in Policy 10 fails the Justified and Effective soundness tests because it: * does not reflect the GNDP's own evidence, that indicates a higher level of growth ought to have been proposed; * has uncertain prospects of delivery, given the infrastructure costs at Hethersett and the JCS's policy requirements for infrastructure to support new development; * is internally inconsistent with other JCS aims and objectives; * does not reflect the results of the issues and options consultation * Is not the most appropriate strategy when considered against the alternatives * is insufficiently flexible to deal with changing circumstances. Hethersett Land Ltd contend that the JCS should have indicated a larger scale of growth at Hethersett, as underpinned by the evidence and as previously included in earlier JCS consultation documents. Main representation: Introduction Hethersett Land Ltd notes that Policy 10 identifies the major new growth locations in the Norwich Policy Area. Strategic growth is proposed to be focussed in a strategic urban extension to the North East of Norwich, with and dispersed across a number of South Norfolk settlements. At Hethersett growth is limited to 1000 homes. This is a significant change from the initial spatial strategy which proposed 4000 homes at Hethersett, based on the delivery of viable sustainable development, including a new high school and transport and utilities infrastructure improvements. Lack of a robust and credible evidence base Hethersett Land Ltd contends that the JCS Policy 10 fails the Justified soundness test, because it is not based on robust and credible evidence. Hethersett Land Ltd suggest that it can be demonstrated that the GNDP's decisions to limit the scale of growth at Hethersett to 1000 homes, have been based on seeking to achieve political aspirations, rather than on the basis of evidence; and although attempts have been made to 'retro-fit' evidence to support a lower figure at Hethersett, it still does not properly underpin this element of the Spatial Strategy. It is also contrary to Officer's original recommendations on the preferred growth scenario, which indicated a higher housing figure for Hethersett. Hethersett Land Ltd suggest that there are still gaps in evidence to substantiate the lower level of growth at Hethersett, particularly the delivery of the secondary school solution, which was originally one of the key factors underpinning the JCS's spatial strategy. Also, none of the new evidence that has been published since the GNDP's decision to reduce the housing numbers at Hethersett in December 2008 would indicate the original proposals for a higher level of growth at Hethersett was unsound.

Deliverability Hethersett Land Ltd contends that the JCS Policy 10 fails the Effective soundness test, because it cannot be demonstrated that it results in a viable and deliverable strategy. Hethersett Land Ltd are also concerned is that there is a lack of evidence demonstrating that 1000 homes at Hethersett is viable and therefore deliverable, given the need for infrastructure to support it and other JCS policy requirements, such as affordable homes, achieving sustainable code levels etc. Indeed, Hethersett Land Ltd note that the evidence included in the EDAA Infrastructure needs and funding study, would suggest that for Hethersett, if public funding cannot be found or infrastructure requirements reduced, that there are serious question marks about the ability of 1000 homes to generate sufficient value to fund the necessary infrastructure and make the release of land worthwhile, even if linked to the provision of homes at Cringleford/Colney. Whilst the site is physically capable of delivering 1000 homes it is contended that the original higher figure would deliver more significant planning benefits for the settlement more in accord with the JCS's Vision and Objectives for sustainable communities and the Act's requirement to contribute to achievement of sustainable development (see below). Failure to meet objectives Hethersett Land Ltd contends that the JCS Policy 10 fails the Effective soundness test, because it cannot be demonstrated that it helps achieve the JCS's objectives for sustainable development. Hethersett Land Ltd notes that JCS objective 1 is to minimise the contributors to climate change. The SA report suggests that a way to do this is to focus new homes close to jobs, services and facilities, so that the need to travel by the private motor car, a key contributor to CO2 emissions is reduced. By artificially limiting growth at Hethersett, based on the evidence that suggests a higher amount could be accommodated there and instead distributing growth throughout South Norfolk an opportunity has been lost to put more new homes in a sustainable location close to jobs, services and facilities. The result is a strategy that inevitably will increase the need to travel by private motor car, which is a key contributor to CO2 emissions and climate change and is directly at odds with this objective. Also, the ability to provide a local district heating scheme is less likely with a smaller scale of development.

Hethersett Land Ltd notes that JCS objective 2 is to allocate enough land for housing in the most sustainable settlements. However, the GNDP's own evidence, including the Sustainability Appraisal, the Housing Topic Paper and that put forward by respondents to previous consultations would demonstrate that Hethersett could accommodate more than 1000 homes without breaching sustainability objectives. Indeed, a higher housing figure would be more likely to achieve sustainability objectives and deliver a sustainable community. The JCS's strategy of limiting growth at Hethersett and spreading it around South Norfolk is therefore at odds with this objective. The SA demonstrates that spreading growth does not result in sustainable patterns of settlement and travel. Hethersett Land Ltd notes that

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O - 11340 - 8570 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11340 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

JCS objective 6 is to make sure people have ready access to services. However, the EDAW report prepared under the instruction of the GNDP themselves helps to indicate that there are serious viability issues concerning the delivery of infrastructure and services at Hethersett given the likely cost and the limited amount of development (1000 dwellings) that can contribute towards it. Hethersett Land Ltd also notes that JCS objective 7 is to enhance transport provision and reduce travel need and impact. However, Hethersett Land Ltd notes the County Council's Public Transport Unit's response to the Favoured Option, which questions the ability of 1000 homes to justify a Bus Rapid Transport (BRT) system at Hethersett. It states that "...BRT is a key element of the Norwich Area Transport Strategy (NATS); and a key tool in achieving modal shift to non-car modes". However, by reducing the ability of it being delivered at Hethersett through limiting growth, it calls into question the ability of the JCS's objective 7 to be met, particularly the ambitions to reduce the need to travel by private motor car. Failure to reflect the result of consultations and engagement Hethersett Land Ltd contends that the JCS Policy 10 fails the Justified soundness test, because it is not fully reflect the result of consultations and engagement. The GNDP's Issues and Options Report of the Consultation Responses (pages 15, 16 and 17) suggests that: "The largest support, at 35%, was for the option of large scale urban extensions and a possible new settlement, against 31% in favour of dispersed growth in a large number of areas."

Also, in terms of the Preferred locations for growth: "Within their own district, South Norfolk's own residents gave greatest preference to options in Long Stratton, Wymondham and the South-West Sector (Hethersett)....." The analysis suggests that the top preferences for individual locations were the north east sector; south west sector (Hethersett) and Wymondham. For instance, 35% of respondents supported large scale urban extensions, including South Norfolk residents. Also, 53% of respondents supported a growth strategy concentrating on the North East, South West (Hethersett) and Wymondham either alone or with one or more additional settlements. Some 24% of responses preferred an option with a more dispersed pattern of at least 10 locations. Not the most appropriate strategy when considered against the alternatives Hethersett Land Ltd contends that the JCS Policy 10 fails the Justified soundness test, because it does not propose the most appropriate strategy when considered against the alternatives. Hethersett Land Ltd suggests that the most appropriate strategy would have been to maintain the higher level of growth at Hethersett as previously proposed and supported by Officers, based on the available evidence and responses to the Issues and Options Technical Consultation. This strategy would have provided better prospects of delivering a sustainable community at Hethersett, including providing the supporting infrastructure, services and facilities that would better contribute towards the 2004 Act's requirement for decisions to be made in light of the need to achieve the objective of sustainable development. Hethersett Land Ltd also suggest that Policy 10 should have acknowledged Hethersett's proximity to jobs at the Norwich Research Park, City Centre, Hethel etc and the ability to access them by non-car means. Also, that all these locations close to Hethersett are proposed for further job growth. The most appropriate approach for Hethersett would therefore be to link housing growth to existing jobs and job growth in these locations, and not to artificially limit it for political reasons. Also, Policy 10 should also have acknowledged that as well as building on the linkages to jobs close by at the NRP and the City Centre etc. that it is important that some employment development is directed to Hethersett, both in the interests of creating mixed, balanced, sustainable communities and to reflect its strategic location close to Norwich and within the A11 corridor which is identified within the RSS as a focus for growth. Inflexibility Hethersett Land Ltd contends that the JCS Policy 10 fails the Effective soundness test, because does not include sufficient flexibility to take account of changing circumstances. Hethersett Land Ltd contends by limiting Hethersett's growth to 1000 homes it fails to include sufficient flexibility to take account of changing circumstances, such as changes to viability and market conditions; possible uplifts in housing numbers that may come about through an RSS review; and under delivery of other locations elsewhere in the Norwich Policy Area, such as that linked to the Norwich Northern Distributor Road delivery. Conclusion The GNDP's strategy to limit growth at Hethersett to 1000 homes raises a number of soundness issues. The main consequence of the approach is that it calls into question the viability of delivering a sustainable community at Hethersett, given the likely infrastructure costs, and other policy requirements. A more appropriate strategy would have been to provide for a greater number of homes at Hethersett, in light of the evidence and in accordance with the Officer's recommended preferred option. This strategy would have provided better prospects of delivering a sustainable community at Hethersett, including providing the supporting infrastructure, services and facilities. Such a strategy would better contribute towards the Act's requirement to seek to secure the objective of sustainable development and the JCS overall ambitions for the creation of sustainable communities.

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O - 11346 - 8234 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii, iii

11346 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary:

This policy and anticipated timescales for housing completions (appendix 6 page 111) identifies that development is not possible within the Growth Triangle until 2014/15. Whilst the majority of this area may be dependent upon the NNDR in order to provide sufficient highway connectivity, there is scope for smaller discrete elements to come forward in advance of this timeframe. Land at Brook Farm and Laurel Farm, for example (see attached plan), is within the Growth Triangle and could be treated as a discrete element with an earlier commencement date. It is adjacent to the existing built up area of Norwich, with strong existing and proposed connectivity to the City. The current planning application for this land (Broadland D.C. 20090886) further enhances the pattern of pedestrian, cycle and bus links with the adjoining area. The level of development proposed through application 20090886 enables the construction of a Link Road, as identified in the Broadland Local Plan, creating access to the existing principal highway network and further enhancing the permeability of the whole area. An additional advantage of economic development such as Brook Farm and Laurel Farm coming forward early is that it can help to address the short term housing sites shortage, as identified in the Broadland AMR 2007/08. It will also overcome the potential issue of saturating the local housing market towards the end of the Plan period. Development at this scale in this location should not compromise the ultimate and correct ambition of creating a master plan for the Growth Area.

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S - 11352 - 2373 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11352 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary:

WymondhamThe requirement to deliver at least 2200 dwellings "located in a number of sites" is strongly supported. A strategy that spreads the new development around the town in a larger number of smaller developments carries less risk of delay and can make better use of existing infrastructure, whilst offering the opportunity to share the costs of any essential new infrastructure between various developers. The much shorter lead in period and spread of the site and developers means that it will be possible to take full advantage in due course of an improved housing market to achieve delivery of the required increase in housing. This is an approach that will also help to address potential shortages in supply that are likely to arise in the policy area as a whole in the earlier years of the plan period, as highlighted by the Housing Trajectory at appendix 6 of the Core Strategy, the Topic Paper on accommodating major growth and by the Inspectors report on and decision to allow a recent appeal by Pelham Holdings Ltd on land to the north of Norwich Common, Wymondham. We wish to take this opportunity to draw attention to the fact that Pelham Holdings Ltd submitted an application to South Norfolk District Council in April 2008, which is still outstanding, for the development of land to the south of Wymondham for up to 3000 dwellings. As this proposal is now contrary in principle to both the adopted local plan saved policies and to the Submitted Joint Core Strategy and as, due to its scale, it is unlikely to be able to assist in meeting the shortfall in five year supply, it should be refused planning permission at the earliest opportunity. Persimmon Homes Anglia have an interest in a 9 hectare site at Norwich Common, Wymondham, which offers the opportunity to provide some 300 dwellings on a site close to existing employment opportunities, very well served by existing services and facilities and with good pedestrian, cycle and public transport links to the town centre and to Norwich. They are actively promoting this site through the LDF and SHLAA processes. It would be their intention to develop this site at the earliest opportunity. The attached document provides further information on the suitability and deliverability of the site.

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O - 11364 - 8047 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11364 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: **Wroxham Parish Council (Mrs Daphne Wyatt)** Agent: **N/A**
[8047]

Full Text:

Summary: Wroxham Ward - Rackheath Eco-Town. New Town, Eco-Town, any large number of new houses equals an opportunist excuse to build high density houses on the smallest possible area, always guaranteed to attract Volume Housing Developers when a new length of road is proposed as well. Why Rackheath? Because it keeps large new housing developments away from the Wards where cabinet members live and represent. The volume of new build housing development proposed in Rackheath, Salhouse, Wroxham, will have serious detrimental effect on the rural aspect of Wroxham Ward. As Salhouse and Wroxham are adjacent to the Broads and the river Bure, Broadland District Council should be protecting our Heritage. While recognising the need for new housing in the Broadland District and that the Brownfield site on the Rackheath/Salhouse border could attract a small development of houses built as homes, we believe that the new houses required should be built on Brownfield sites across the whole community of Broadland district. Notwithstanding the misguided views of Broadland District Council. Fails the test of Effectiveness and Justification.

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O - 11365 - 8515 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11365 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Long Stratton Parish Council (Mrs Evelyn Riches) Agent: N/A
[8515]

Full Text:

Summary:

It is considered that the strategy is unsound in respect of policies for places (reference to Long Stratton in the policies statement on page 65) - in that there is no guarantee that the proposed bypass would be built if the full level of growth is dependant on overcoming sewerage constraints, and likewise regarding water and electricity (reference to page 67 6.22) for the strategy to be sound. That the provision of these facilities would definitely be possible before various stages of the proposed development takes place should be made clear at this stage. The fact that a bypass could definitely be funded by developer contributions, and be in place as a pre-requisite before housing development takes place also needs to be made clear. With development taking place (after the first 50 in 2017/18) at an average of 200 a year (annual growth locations page 111), it needs to be made clear as to the requirement for a bypass to be in place as a requisite before housing development if it is to be funded by growth. At page 82 6.52 it states that 'Growth will fund the bypass' but when, if development is to be as indicated? It should also be guaranteed, not just intended (ref:- policies for places page 65 of the strategy document) that a bypass would be in place at least before a certain number of houses are built and occupied. Ideally a bypass should be in place before any proposed housing takes place, but it is considered that there should be a number of houses stipulated in order to make the strategy sound, and that the number should be no more than 100 built and occupied. There is no consistency with the number of houses for Long Stratton mentioned in the strategy - 1800 at some places, at least 1800 at others!! It is considered that this makes the strategy unsound in that the strategy could go forward on an uncertain number.

At page 66 6.16 it is stated that 'In 2009 a County Council promoted bypass has the benefit of planning permission' - with this permission expiring in 2010, that there will be no lowering of the specification if a further planning application has to be submitted made should be made clear, as a single carriageway bypass should not be a consideration.

It is pointed out that the indication that the London main railway line is to Long Stratton as shown on page 61 is incorrect - there is no railway line to Long Stratton - this is misleading!!

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O - 11373 - 8627 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11373 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: The current JCS pattern of growth does not maximise development in the most sustainable locations. Objection 2: The current JCS pattern of growth is too dispersed and will miss an opportunity to deliver critical new infrastructure. Objection 3: We object to the reliance placed on growth needed and located to being forward new roads. Objection 4: Focussing development on settlements with good existing infrastructure will lower risk and bring forward development earlier. We object to Policy 10 and propose that the pattern of growth be redistributed as follows. Based on access to existing services and facilities across the different growth locations, growth should focus on a Wymondham strategic site release and a NE Norwich strategic site release. Other settlements beyond these locations, such as Hethersett, Cringleford, Long Stratton and Easton could take up to 500 dwellings each and then some of the Key Service Centres could take up to 50 dwellings each. This is summarised in Table 10. Location No of dwellings Comments Norwich 3,000 Constrained by flatted commitments Broadland (smaller/medium sites) 5,000 Medium sites up to 500 dwellings South Norfolk (smaller/medium sites) 4,750 Medium sites up to 500 dwellings NE Norwich and Rackheath Eco Town Strategic Site 7,000 Alteration to strategic site release rising to 10,000 post 2026 Wymondham Strategic Site 6,500 Alteration to strategic site release (4,000 by 2026) Total

26,250 23,750 to 2026 + 2,500 post 2026 Table 10: Revised Proposed Pattern of Growth in NPA 3.3 Our objection relates to the transport and education provisions of Policy 10, which states that, inter alia, developments will: "Achieve a major shift away from car-dependency and be designed around walking and cycling for local journeys and public transport for longer journeys" "Include new or expanded education provision addressing the needs of the 0-19 age range, local retail and other services, community and recreational facilities, small scale employment opportunities and primary healthcare facilities." 3.4 As argued previously, the current proposed pattern of growth will fail to engender the "major shift" away from car-dependency by its inability to make a high frequency BRT service viable. Also, given that Wymondham High School is at capacity and the threshold of new houses to finance a new secondary school is circa 6,000, there will be problems with the delivery of education infrastructure. Indeed this problem is acknowledged within Policy 10 itself: "Secondary education provision remains to be resolved but is likely to require the relocation of the existing High School to a new site" (JCSPS, Policy 10) 3.5 With respect to relocating Wymondham High School's sixth form college (circa 300 students enrolled at the sixth form) in order to create extra secondary capacity, we believe that this would only create a limited and temporary solution to accommodating the demand generated by the proposed pattern of growth. On a political level, removing Wymondham High School sixth form, which was recognised as "outstanding" by OFSTED (2007) will prove to be highly controversial and could potentially damage levels of attainment going forward. 3.6 Our alternative proposal for growth provides a pattern of growth which concentrates housing growth in the most sustainable locations. This has a number of advantages: "More sustainable" "Allows development to come forward earlier" "Secures important new infrastructure" "More Sustainable/Allows development to come forward earlier" 3.7 There are a number of studies that underline the importance of existing facilities in reducing the risk associated with the construction of new settlements and increasing their sustainability. In particular, Norwich Growth Area - Infrastructure Need and Funding Study, EDAW (December 2007) (GNIN&F2007) compared two different growth options. Scenario 1 is based on an urban extension of 7,500 homes to the North East of Norwich in Broadland combined with an extension to an existing market town (Wymondham) of 3,500 dwelling. Scenario 2 is based on a completely new settlement set apart from existing towns/villages to the South of Norwich consisting of 10,000 dwellings to the west of Stoke Holy Cross and north east of Mulbarton in South Norfolk District. 3.8 Growth Scenario 1 (expanded towns) is found to be preferable as it lies on expanding the very good existing facility base. In particular, the study found that "Sites that expand from existing uses, or increase the density of an existing, can make relatively sustainable use of the existing transport, utilities, social and economic infrastructure in place and help create a local critical mass to sustain greater public transport and other facilities" (GNIN&F2007, Para 6.20) 3.9 With respect to Scenario 2 (new settlement) the report found that this development would need significant transport and utilities infrastructure to be front-loaded before homes could be realistically occupied. Furthermore, the study found that given: "The time it takes for the proposals to be developed and granted planning permission, it is unlikely that development on a new village could occur before 2015/16. During 2015/16, 300 dwellings could be delivered and this could increase annually to a regular completion rate of 600 units per year by 2018/19. This would deliver 3,000 homes by 2021, 7,000 less than originally predicted." (GNIN&F2007, Para 6.19) 3.10 To summarise, the findings of the GNIN&F2007 study are intuitive: the existence of physical and social infrastructure is key in ensuring that development is sustainable and deliverable. Put simply, without key facilities and services development will not take place. A standalone village would have to provide a large amount of up front infrastructure which represents greater cost and risk, which could jeopardize the delivery of the housing target. Wymondham, as the evidence presented in Appendix 3 of this report demonstrates, enjoys access to a comparatively larger number and wider range of services and facilities than other locations, making it a highly sustainable and viable location to accommodate the proposed housing growth. This is confirmed in the evidence base for the JCSPS. Given its existing range of facilities Wymondham and the NE Norwich would be able to accommodate growth more successfully than other locations with a smaller facility base or no facility base. Secures important new infrastructure 3.11 As discussed previously, there are distinct advantages in terms of delivery of new facilities, by concentrating growth within fewer locations. The review of housing thresholds required for new infrastructure in Appendix 4, indicates that in order to achieve a new secondary school and a high frequency BRT circa 6,000 new

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O - 11373 - 8627 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11373 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

homes are required in order to ensure viability. 3.12 Our proposed revised pattern of growth will deliver, as part of a comprehensive masterplan, the following facilities: South Wymondham* A new bus service linking to the station and town centre* Improvements to accessibility at the station * A new local centre * 2 x 2 fe primary schools with pre school provision * New civic space* An employment area (2.3 ha)* 1 x mixed use local centre in the east (4.8 ha)* 1 x mixed use local centre in the west (1.5 ha)* 1 x sewage works (4 ha)* 1 x park and ride facility (4 ha with a minimum 500 spaces)* Informal open space (55.06 ha)* Formal open space (14.2)* SUDSNorth East Wymondham* A new station linked to park and ride* A complementary centre (consumer and comparison goods retailer) to relieve the towncentre from large floorplate uses* A mixed use local centre (4.1 ha)* 1 X secondary school* 2 X 2 fe primary schools with pre school provision* New civic space* 1 x care home and extra care accommodation* An employment area (3.5 ha)* A 20 Ha employment area to the south of A11* 1 x park and ride facility (3.5 ha with min of 500 spaces)* 1 x CHP plant* Informal open space (55.9 ha)* Formal open space (included at secondary school)* Fast track Bus Rapid Transit to Norwich. Omission Policy Infrastructure3.13 We recommend a new policy be created to deal with infrastructure and explain the relationship of infrastructure to spatial strategy within the first 5 years of the plan 2011 to 2016 in the form of a detailed Delivery Plan. This will replace the key dependencies on pages 66/67 of the JCSPS and identify specific infrastructure requirements and who will be responsible for delivering them. This is discussed in more detail under our comments on Policy 20: Implementation.

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O - 11405 - 7172 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11405 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary: Sustainability Appraisal Not compliant. Although the SA highlights that major growth located close to a NDR could result in environmental impacts such as car-based trips, the SA does not consider alternative transport options which would avoid or reduce adverse impacts as required by the SEA Directive. The SA has treated the unsustainable NDR as part of the baseline case and not as an option. Responding to public criticism on this traffic-generating impact of the NDR, the SA Report asserts: "The NDR may encourage car-based trips", but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of the road by residents of the Growth Area. However, the NDR Major Scheme Business Case (July 2008) shows high traffic growth on a number of road links across the Norwich Area as a result of the NDR Preferred Option, with substantial growth on radial roads in north-east Norwich and an increase in carbon dioxide emissions compared to Do-Minimum. Norfolk County Council has programmed construction of the NDR in 2014-15, whilst sustainable transport measures, including a bus rapid transit system, are not programmed for completion until 2025. There is a strong danger that people will get into the habit of using their cars if a NDR goes ahead. Local experience has shown the difficulty of transferring orbital car-based journeys to sustainable modes.

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O - 11417 - 7172 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11417 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: **Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172]** Agent: **N/A**

Full Text:

Summary:

Not legally compliant with RSS Norwich Policy NR1 which seeks to: 'achieve a major shift in emphasis across the Norwich Policy Area towards travel by public transport, cycling and walking.' Policy NR1 must also be read alongside wider RSS policies to reduce the region's impact on climate change by locating development so as to reduce the need to travel and effect a major shift in travel away from car use towards public transport, walking and cycling. The GNDP claims that a NDR is in conformity with the RSS because RSS Policy Norwich NR1 refers to 'having regard to the Norwich Area Transportation Study (NATS), which provides a strategy for improving access by all modes of transport across the Norwich Policy Area' and NDR is a key element of NATS. At the time of the RSS EiP in 2005, the NDR project in the Draft East of England Plan was a full orbital route to the north of Norwich, approved as part of NATS in 2005. Norfolk County Council dropped the western section over the River Wensum SSSI/SAC shortly before the EiP and the NDR became a three-quarters road. Depending on the outcome of the Minister's decision on Programme Entry, the NDR could be further reduced in length. The Eastern Daily Press on 11 December 2009 reported that DfT civil servants are recommending Programme Entry for a NDR between A47 Postwick Interchange and A140, but not west of the A140. If accepted, a half route NDR would largely function as a development road for north-east Norwich and not as a full or three-quarters distributor road for north Norwich. Also, the NATS would no longer be predicated on a NDR. In such circumstances, a NDR would not be in conformity with the RSS Policy NR1 as the purpose of the NDR/NATS approved by Norfolk County Council in 2005 would have changed considerably.

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O - 11421 - 905 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - iii

11421 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 10 - Locations for major new or expanded communities in the Norwich Policy Area The sustainability Appraisal report correctly identifies that many settlements have sensitive historic environments. It is important that this is recognised within policy 10 to ensure that this is a key consideration in any masterplanning process.

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O - 11422 - 905 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - iii

11422 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 10 Old Catton, Sprowston, Rackheath. Thorpe St Andrew growth triangle, p62/63

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O - 11424 - 905 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - iii

11424 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 10 Wymondham, p64Wymondham is a settlement of high historic interest and sensitivity, and has long been recognised as requiring particular care in its future planning. We recommend that safeguards should be included to ensure that its character is protected

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O - 11425 - 905 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - iii

11425 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: Policy 10, Long Stratton, p65 While we note that the policy does not commit to a route for the Long Stratton bypass, any route is likely to be the same side of the settlement as the proposed housing development. The Historic Characterisation and Density Assessment (2009) identifies the east side of the settlement as of high sensitivity in terms of the preservation of historic landscape features.

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O - 11426 - 905 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - iii

11426 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: References for Policy 10, p68

Joint Core Strategy Proposed submission Document

O - 11431 - 7172 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11431 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary: The GNDP has not selected the most appropriate strategy when considered against reasonable alternatives. The GNDP Self-Assessment Soundness document notes that 'the choice of strategic options were political decisions and were made having considered all of the evidence and the consultation responses'. Each of the three growth location options consulted on by the GNDP featured a north-east growth triangle (7 - 10,000 dwellings including an eco-town at Rackheath) straddling a NNDR. Growth in this location has been deliberately located in order to strengthen the GNDP's case for a NNDR and unlock central Government funding for infrastructure for spending on a NNDR. Other options for testing ought to include the relocation of some housing growth from the north-east to other parts of Greater Norwich such as the City centre, Easton, next to Broadland Business Park and South West of Norwich (close to strategic employment area at Colney). NNTAG considers that land between Broadland Business Park and Great Plumstead, served by a new halt on the Norwich to Sheringham railway line, is a more suitable candidate for an urban extension and it would avoid the coalescence of villages to the NE of Norwich. Some redistribution of housing growth away from north-east Norwich would have the added benefit of supporting high frequency bus services to particular growth locations. For example, the County's consultants advise that increasing the total housing allocation for Wymondham, Hethersett and Cringleford from 4,500 to 5,000 houses would provide greater comfort regarding the market potential for BRT in the A11 corridor. The SA Report observes that dispersing growth in the South Norfolk area of Greater Norwich could have a number of sustainability consequences such as providing attractive public transport options that encourage people to use their cars less. However the option of an extra 500 houses at Cringleford/Hethersett (but not Wymondham) should at least be tested.

Joint Core Strategy Proposed submission Document

O - 11442 - 8585 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11442 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr Paul Howes [8585]

Agent: N/A

Full Text:

Summary:

This proposed development at Rackheath is a solecism. In short, the Norfolk & Suffolk Broads are an area of unparalleled vistas, wide skies and quietness, a haven amidst the hurly-burly of modern urban life, recognised by the government since 1984 as a national resource equivalent to a national park. You propose to put several thousand houses and a huge conference centre into an area abutting this. As a property owner/occupier, I object totally and completely to any large-scale development so close to my property but in which I have had no say at all. No-one has formally notified me. Yet I will have an increased level of noise at night due to the topology of the river valley and increased traffic levels to cope with. There will be pressure on local amenities such as the Broads and stresses on other aspects of local infrastructure such as water, sewerage and so on. I wish to be included in all further communications on this topic. Finally, I would like you to be aware that if my own experience is anything to go by, there must be several organisations who have not been consulted on this issue. Certainly the Broads Society was not on the list and has only recently become aware of this proposed development. It would not surprise me to learn that objections will be lodged against the small amount of time allowed for consultation, not to mention the process.

Joint Core Strategy Proposed submission Document

O - 11445 - 1797 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11445 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Great & Little Plumstead Parish Council (Mr I Bishop) [1797] Agent: N/A

Full Text:

Summary:

After careful thought and consideration we believe these proposals are unsound and there are far better alternatives available, which are much more suitable to meet the needs for housing, road infrastructure, sustainable employment and prosperity for the longer term with regard to Norwich and Norfolk, rather than through the allocation of Major housing along the line of the proposed NNDR, in order to fund the construction of the road. We would agree with the principles put forward in the GNDP summer update 2008 and quoting your words: "What we are working to achieve, local people will". - "Live in a distinctive place, whether part of the historic city, suburbs or fringe parishes, a market town, village or countryside. - Trust that the special character of the countryside, natural, built and historic environment will be valued, protected, managed and enhanced, with people proud of where they live, work, study or visit. - Live a more environmentally friendly way of life in communities, which have efficiently managed water, energy and water removal. - Have access to a wider variety of services and facilities, better health and high value, fulfilling jobs based on enhanced education and skills, increased prosperity and reduced deprivation in urban and rural areas. - Enjoy high quality surroundings in high standard homes, with support and care if needed, at a price they can afford. - Know that existing and new development will create communities, which are sustainable, foster pride and a sense of belongings." Unfortunately, the current proposals do not reflect or deliver any of these aspirations listed above. We agree with the wording that "the fundamental question is the establishment of principles" However, we think these principles should include the concept of saving, preserving and enhancing existing villages, markets towns and their communities within the County of Norfolk and in this respect, the consultation documentation is lacking. At the centre of the proposed Joint Core Strategy is that Norwich will be the centre of activity and employment. One of the outputs of this strategy is the Norwich Area Transport Strategy (NATS) its principles objective to transport people to and from Norwich. Again, an output of this is a massive carbon footprint, pollution in the form of carcinogenic fumes, increased noise and congestion. A further example of this can be observed with the current park and ride at the A47 Postwick junction, 70% of traffic, currently using it is from the coastal area, at the same time there are business parks empty in the area they are coming from. The JCS housing proposals are fundamentally unsound as these allocations are totally reliant on the construction of the proposed NNDR. A decision on whether the road will even be funded by central Government will not be made until 17th December 2009. Without the NNDR, the GNDP has accepted the allocations cannot proceed. The proposed NNDR will not decrease traffic; on the contrary, it will significantly increase traffic for Norwich and Norfolk. An integral part of the NNDR plans are the proposed closure of Smee Lane, Low Road and Middle Road, again the closure of these feeder roads will result in the funnelling of traffic on to the Plumstead Road, Salhouse Road, and Thorpe Road causing even more congestion. No provision is made in the NATS or the JCS for the urgently required link road from the C874 Plumstead Road to the Postwick roundabout. This should have been implemented by now and be in place, as it was an integral part and requirement of the planning consent for the current business park. Consequently, traffic is increasing on a daily basis on Green Lane north with all the associated environmental pollution and severe blighting of residential property. Norfolk has to be a classic case for intervention, given that its growing industry is largely agriculture and tourism and as for commercial, financial and administrative employments, these are increasingly being enabled by people to operate from home because of advances in telecommunications and the World Wide Web internet. Progressive growth along with housing can equally be achieved by controlled enlargement of existing villages throughout Norfolk, Acle, North Walsham, Holt, Diss, Wymondham and Attleborough, Hethersett and others providing Local employment with minimum travel requirements and resulting carbon footprint. Norwich and Norfolk benefits from high value employment such as John Innes Institute, UEA, Lotus engineering. NNH Trust. However, it does not have to be centred on Norwich. Where high value/high Tec industry/employment such as exist in Cambridge, now this should be attracted and centred South of Norwich close to the A11. With the increasing need to urgently reduce CO2 emissions for health and environmental reasons which are linked with commuting between housing and employment the JCS should have set out sustainable housing and employment proposals to significantly reduce the need for all travel use, not be centred on the need to fund the NNDR which will only generate more car/vehicle movements use and increase CO2 emissions. That is why we believe the major growth areas should be along the A11 corridor, which has existing, excellent road infrastructure and rail facilities, which can be upgraded in a much more cost effective way than building the Rackheath eco Town in Broadland, east of Norwich and the proposed NNDR.

Joint Core Strategy Proposed submission Document

S - 11451 - 8587 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11451 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: support for a single co-ordinated approach and detailed master planning for each quarter in the growth triangle. This is a sound approach which will ensure timely delivery and phasing of development areas. The landowners for whom this rep is submitted confirm the availability of their landholding of approx 17ha for development. There are no constraints on this landholding which would prevent the early delivery of housing and associated facilities and infrastructure, which contribute to the implementation of the proposed development programme for the growth triangle inside the NDR.

Joint Core Strategy Proposed submission Document

O - 11459 - 2644 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii

11459 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Wrenbridge (Harts farm Ltd) (The Manager) [2644] Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary: Wrenbridge (Harts Farm) Ltd supports Wymondham's identification in JCS Policy 10 as a suitable location for major new growth. However, Wrenbridge objects to the omission in the Wymondham section to any reference to the need to deliver new employment sites as required by JCS policy 9: Strategy for growth in the NPA. Wrenbridge suggests that this omission results in an internal inconsistency and therefore fails the Effective soundness test. This failure is not fundamental to the Core Strategy and relatively straightforward to remedy with a non-substantive change to Policy 10, reflecting the need for new employment sites in Wymondham. Wrenbridge are also concerned by the policy's suggestion that all growth in Wymondham is dependent upon expanding capacity of the A11/A47 Thickthorn junction. Wrenbridge suggests that there is insufficient evidence at this time to demonstrate that 15 hectares of employment growth at Wymondham would have a detrimental impact of the ability of the A11/A47 Thickthorn junction to function properly. This part of policy 10 therefore fails the Justified soundness test because it is not based on sufficiently robust and credible evidence. Wrenbridge contends that a certain level of growth, including employment growth should be permitted in advance of A11/A47 Thickthorn junction improvements, provided it can be demonstrated that it would not impinge upon the junction's ability to function properly. Again Wrenbridge considers that a non-substantive change can be incorporated into the policy to reflect this suggestion.

Joint Core Strategy Proposed submission Document

S - 11461 - 8587 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11461 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re policy 10 para 6.14 the proposed growth triangle catton / sprowston / rackheath / thorpe St A provides good access to strategic employment opps. and does not compromise important wildlife habitats or landscapes of historic or cultural importance, and is not subject to the threat of flooding. The JCS is based on sound infrastructure delivery planning and is consistent with national policy. The JCS establishes an appropriate time horizon for development which will bring forward and deliver developable land for housing in line with PPS3 and will ensure improved longterm housing supply incl much needed affordable homes. The JCS identifies who is intended to implement different elements of the strategy and when this will happen. It ensures that the partners who are essential to the delivery of the plan, incl landowners, are signed up to it.

Joint Core Strategy Proposed submission Document

S - 11462 - 8587 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11462 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re policy 10 paras 6.18 - 6.20 the JCS is based on sound infrastructure delivery planning and is consistent with national policy. The development of land identified in the growth triangle will contribute towards the required transport infrastructure, incl the NDR, other highway infrastructure, improved bus services (incl bus priority measures) and better provision of facilities for pedestrians and cyclists.

Joint Core Strategy Proposed submission Document

S - 11465 - 8587 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11465 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re policy 10 paras 6.21 - 6.23The JCS is based on sound infrastructure delivery planning and is consistent with national policyThe development of land identified in the growth triangle and concentration of that growth will support the provision of local services and facilities, including the identified primary schools, provision, replacement and upgrading of utilities and associated service infrastructure, and also contribute to green infrastructure for the overall area.

Joint Core Strategy Proposed submission Document

S - 11467 - 8587 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11467 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re policy 10 Support for the structure of a new community in the growth triangle in the form of a series of inter-related new villages or quarters. this form of development will relate sympathetically to the existing settlement structure of the area and will create an identity and sense of place for the planned new development. It will enable phasing of development and allow early delivery of housing, including much needed affordable housing, contributing towards at least 7000 dwellings rising to 10000 by 2026. this minimum level of housing development is essential to support the required infrastructure and related facilities to support the new community.

Joint Core Strategy Proposed submission Document

O - 11474 - 934 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii

11474 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

As raised in our earlier response to the draft submission, we would seek further details of the 'significant area north of Rackheath' to be provided as 'green space to act as an ecological buffer zone and ensure no significant adverse impacts on the Broads SAC' (page 63 - n.b. this should also include Broadland SPA and Ramsar), in order to assess its effectiveness. At present, this proposal lacks sufficient detail to address our concerns over increased recreational pressure on the Broads. We are concerned that the proposals for Easton/Costessey, although a relatively small increase in housing numbers, do not mention the inclusion of green infrastructure, which must be integral to all aspects of growth in the plan.

Joint Core Strategy Proposed submission Document

S - 11477 - 934 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11477 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary: NATS One of the identified dilemmas in the JCS is over the growth in the proposed Rackheath ecotown, and other residential developments planned for the north east sector, and their reliance on the Northern Distributor Road. We would like to remind the GNDP that the Planning Policy Statement (PPS) on ecotowns (supplement to Planning Policy Statement 1) calls for planning applications to 'demonstrate how the town's design will enable at least 50 per cent of trips originating in ecotowns to be made by non-car means.' (4.13 (a), p.17), which should incentivise the development of a second rail station at Rackheath as an alternative to reliance on motorised transport.

Joint Core Strategy Proposed submission Document

S - 11480 - 8224 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11480 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Barratt Strategic/Manor Farm Rackheath [8224] Agent: CGMS Ltd (Mr Richard Atkinson) [7681]

Full Text:

Summary:

I refer to the pre-submission document for the Joint Core Strategy for Broadland, Norwich and South Norfolk which was released for public consultation on 2nd November. This representation, in support of the Joint Core Strategy, is submitted on behalf of the promoters of Rackheath Eco-Community - Barratt Strategic and Building Partnerships Ltd. We are pleased to note that the document is generally supportive of the Rackheath Eco-community and its policies are consistent with the objectives of the Rackheath Eco-community and are generally consistent with the Eco-towns submission to DCLG. We would not wish to take issue with the legality of the process and consider that the document provides a robust assessment of the evidence base and has responded positively to previous rounds of consultation. The overall approach of preparing a Joint Core Strategy is supported. The joint working of the councils in the Norwich Policy Area provides a comprehensive approach based on a single database of information. It results in a coherent strategy that paves the way for site specific work that all councils can take forward in similar timescales. This approach is a refreshing change and contrasts with the approach being adopted in other parts of the region. The Northern Distributor Road We support the approach to transport planning which includes a proposed Northern Distributor Road (NDR). Whilst the strategy relies on a favourable decision on the funding for the Northern Distributor Road it is the most practical way to create capacity and to provide a modal shift to Rapid Bus Transit (RBT) in Norwich. We therefore agree with the statement set out on page 7 which states that " Significant improvement to the bus, cycling and walking networks in Norwich can only be achieved with the road capacity released by the NDR which also provides necessary access to key strategic employment and growth locations." As far as the Eco-Community is concerned, travel planning is predicated on extensive provision of public transport (including the new rail station, high quality bus transit and walking and cycling routes). The implementation of the Northern Distributor Road would clearly also deliver benefits to the Growth Triangle in terms of its general accessibility, however over-reliance upon private vehicle movements would be actively discouraged in the Eco-Community where the emphasis is on maximising non-car use for all trips. This position on Rackheath is consistent with the DCLG statement, in selecting the site as an Eco-town, that " the proposed NDR has yet to receive DfT major scheme approval, although consideration of the scheme is well advanced, but alternative means of improving road access to Rackheath are also achievable". It is understood that a decision on funding is expected from the Department for Transport on 15th December, one day after representations have to be made to the Joint Core Strategy, and we trust that a positive outcome will be received. In the event that this decision is unfavourable, the promoters of the Rackheath Eco-Community will work with GNPD and other key stakeholders to ensure that an alternative strategy is quickly brought forward which would support delivery of the Eco-Community. Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle On page 22, the Spatial Vision refers to growth being focussed "on brown field land and in a very large mixed use urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle." Appendix 5 defines this area as including the whole of the Eco-community with the exception of land to the north of Stonehouse Road, as well as land within the NDR. This is not considered to be a material issue as the current masterplan shows the area north of Stonehouse Road retained as open land. We note that the growth triangle does not include land east of the railway in the vicinity of Rackheath. While not relevant to the current consultation, it would be prudent for this area to be considered in any future revision to the strategy in the light of enhanced growth forecasts which are expected to emerge from the review of the Regional Spatial Strategy to 2031. The current strategy allows for 2000 houses per year 2021-2026 whereas the scenarios in the Regional Spatial Strategy review range from 2170 to 2400 per year for the Greater Norwich area. Policy 9 allows for 7,000 dwellings in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle by 2026 rising to around 10,000 "eventually". Policy 10 sets out the key parameters for the area. While not disputing the soundness of the plan, we would suggest that the wording on housing numbers could provide clarification that, of the 10,000 proposed, "a minimum of 4,000 dwellings should be provided in a new settlement at Rackheath".

This would be consistent with the proposals for the Eco-Community submitted to, and accepted by DCLG in determining that Rackheath should be cited in the Eco-towns Planning Policy Statement (Supplement to PPS1). Similarly it could be clarified that the district centre referenced in Policy 10 and the secondary school and household waste recycling centre should be at Rackheath.

Joint Core Strategy Proposed submission Document

O - 11488 - 8218 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11488 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Wymondham Consortium of Landowners [8218] Agent: Bidwells Norwich (309) (Mr Rob Snowling) [8381]

Full Text:

Summary: Bidwells, on behalf of the Wymondham Consortium of Landowners supports the proposed allocation of 2,200 dwellings at Wymondham. We consider that the decision to identify Wymondham as a location for growth within the Norwich Policy Area under policy 9 of the proposed submission is 'sound' Furthermore we are generally supportive of policy 10 which identifies Wymondham as a major growth location, However Policy 10 includes the statement that growth at Wymondham is dependent on expanded capacity of the A11/A47 Thickthorn junction. This policy has been informed by the Gretaer Norwich Infrastructure Needs and Funding Study (July 2009) which forms part of the evidence base for teh JCS. The Norwich Infrastructure Needs and Funding Study (July 2009) identifies Wymondham as the only growth location that will bear the costs of the improvements to the Thickthorn junction. However, we do not consider that growth at Wymondham is wholly dependent on improvements to the Thickthorn junction nor do we consider that it is appropriate that the cost of any improvements are attributed solely to growth at Wymondham. In summary we do not consider that policy 10 should refer to the Thickthorn junction in respect of growth at Wymondham. Nor do we consider that this policy in its current form is based on a robust and credible evidence base and suggest that the policy is amended to exclude reference to the A11/A47 junction in order to be JUSTIFIED. The decision to direct major growth to Wymondham is fully in accordance with national policy guidance notable PPG13 (transport).

Joint Core Strategy Proposed submission Document

O - 11489 - 8218 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11489 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Wymondham Consortium of Landowners [8218] Agent: Bidwells Norwich (309) (Mr Rob Snowling) [8381]

Full Text:

Summary: Bidwells on behalf of the Wymondham Consortium of Landowners support the proposed allocation of 2,200 dwellings at Wymondham. We consider that the decision to identify Wymondham as a location for growth within the NPA under policy 9 of the proposed submission JCS for Broadland, Norwich and South Norfolk is 'sound'. Furthermore, we are generally supportive of policy 10 which identifies Wymondham as a major growth location. However we have provided evidence to suggest that a significant proportion of the 2,200 dwellings being directed to Wymondham can be delivered on land at 'Wymondham South' and consider that policy 10 should therefore identify this land as a future location for housing growth. We consider that the evidence we have provided supports the deliverability of housing growth at Wymondham South and policy 10 should be amended to provide a better planning framework where growth at Wymondham should be located to enable the preparation of a planning application at the earliest opportunity. Therefore, whilst we support the identification of Wymondham as a location for major growth and are generally supportive of policy 10 we do not consider that it identifies the most appropriate strategy based on the evidence that is available and consider that it should be amended in order to be JUSTIFIED. We consider that the identification of Wymondham South under policy 10 will improve the soundness of the proposed submission JCS. PPS12 (local Planning) refers to the benefit to delivery objectives in including reference to key sites in core strategy development plan documents (par. 4.6 -4.7). (SUPPORTING ADDITIONAL INFO SUPPLIED)

Joint Core Strategy Proposed submission Document

O - 11500 - 8589 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11500 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary:

The fourth point concerns the Eco Community. Quite a lot of the initiatives in the strategy refer to this project but it is too remote from the city to achieve its transport objectives. The properties will be up to £40,000 more expensive than current construction on the basis of a response to the consultation in June. This will lead to higher unit density either in area or height. Some of these housing developments are projected to contain three and four storey high buildings. This would be completely alien to the character of a rural community and marks an excessive urbanisation of this tract of land. In the text there is a reference to the use of gold and silver standards of construction with an implication that the lower one can be adopted. Neither of these constitutes a high standard of development nor could easily be described as an ecological beacons of excellence. There might be a need to subsidise the cost of these developments in order to have a building consortium take on the responsibility for such a scheme. Either that or the quality and eco credentials of the site will be degraded. The strategy refers to a different relationship with developers and the introduction of a new developer contribution mechanism but worryingly it is not qualified further. It looks like another cost to be borne by the community. The site is going to be a mixed development where houses and businesses will be co-located. However, every business is likely to require transport and the concept of a single car for every family looks to be unrealistic, as are plans to penalise those who do not live in a sufficiently eco manner according to some arbitrary rules to be determined by the Council. There appear to be no provision for local road improvements beyond those required for better bus services.

Joint Core Strategy Proposed submission Document

O - 11514 - 8591 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii

11514 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We question the meaning of paragraph 6.18 of the PSD wherein it is stated that "completion of a bypass is a pre-requisite for the scale of growth identified in Long Stratton." It is the position of the GNDP that the whole bypass for Long Stratton must be complete and open to traffic before the new housing/employment areas are developed? We accept that the proposed substantial expansion of Long Stratton cannot be achieved without the construction of a bypass in parallel with that development exercise. Essentially, a bypass at Long Stratton forms an integral part of the overall development package for the town. Paragraph 6.17 of the PSD refers to "a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth." We assume that the GNDP considers that this approach is applicable to all the proposed growth locations and that strategy to be employed at Long Stratton is no different to the other growth locations. We consider that there is an unnecessary and unhelpful ambiguity in the wording of the last sentence of paragraph 6.18 of the PSD and such ambivalence could be removed if the sentence was reworded to indicate that the provision of a bypass at Long Stratton is an integral part of the proposed development package for the town. The bypass will be implemented parallel with the delivery of the new housing and employment areas. We also note within paragraph 6.18 that reference is made to the need for significant highway improvements at junctions with the A47, including the A140 at Harford. We note from the evidence base that the traffic modelling work supporting these improvements outlined in that report are therefore subject to further change and clarification. We expect that this work will be updated and refined by the GNDP in due course so that the improvements can be more closely related to the actual distribution and impacts of development in the growth area. We have noted that paragraph 6.19 of the PSD states that "growth at Long Stratton requires improvements to public transport including bus priority improvements on the approach to the A140/A47 Harford junction with further bus priority on the A140 corridor to the city centre." There is already a high quality public transport facility serving Long Stratton as recognised in the Transport Topic Paper and the development package proposed through the JCS will ensure that the opportunity arises to enhance that public transport amenity/system. The evidence base includes a report on the requirements for public transport serving the growth area and it is considered that within the Norwich Urban Fringe alternative routing of bus services could be considered over using the A140 to reach the City Centre. There is therefore more than one option for an improvement to bus services north of the A47 to deliver improved facilities in association with development. The PSD rightly acknowledges that Long Stratton contains a good range of local jobs, services and other community facilities which distinguish the town as a sustainable location for the accommodation of further growth. Page 8 of the PSD acknowledges that Long Stratton has a high degree of sustainability in its own right and has a greater independence from Norwich than many other towns/villages. Paragraph 6.52 of the PSD states that Long Stratton "has by far the best range of local shops, services and employment opportunities of the area's Key Services Centres. It also benefits from reasonable bus links to Norwich. Significant development is proposed (including a bypass to deliver local environmental improvements by removing through-traffic), of at least 1,800 new homes plus supporting community and commercial development, expanded employment opportunities and enhanced public transport. Growth will fund the bypass." The strategy incorporated within the PSD reflects the existing local settlement pattern and can secure a bypass for Long Stratton which is a long held aspiration of residents and local councils. In the light of the many references to the positive benefits of growth at Long Stratton, we object to the strongest terms to the Pre-Submission JCS SA Report (Sept 09) particularly the unsubstantiated and specious comments at paragraphs 5.4.8 and 5.4.9. The town already exhibits sustainable patterns of travel and contains significant local employment opportunities. Given these facts, the content of paragraph 5.4.8 of the Sustainability Appraisal Report is inexcusable and insupportable. The SA report contains an inappropriate evaluation of the impact of growth at Long Stratton and does not represent a sound or equitable assessment of the situation. The Spatial Strategy for the Norwich Policy Area should be based on more than a simplistic/superficial scanning of the substance of the relevant information. Paragraph 5.4.8 of the SA Report is fallacious and unsound. Significant numbers of local residents already use public transport to reach the City Centre as the area's most accessible location, a factor recognised in the Transport Topic Paper, and there is no analysis contained within the SAR to suggest that people occupying the new dwellings will not equally utilise a service to this key destination that will be enhanced beyond that already available. Furthermore, we were not aware that the Core Strategy had to be based upon a policy framework which related new homes merely to the existing strategic employment locations. As the Proposed Submission Document itself acknowledges, Long Stratton presently contains a notable level of employment opportunities which will be augmented by the proposed expansion of the settlement. We fundamentally and wholeheartedly disagree with the observation at paragraph 5.4.8 of the SAR that the extremely limited and illogical consideration given to Long Stratton constitutes "probably the key issue that has been highlighted through this SA." On the contrary, we would observe that uncertainties regarding the delivery of the Norwich Northern Distributor Road represent the most significant issue in terms of delivery and environmental impact. The letter from the GNDP Manager regarding the publication of the JCS draws attention to the key issue of the NNDR. We endorse paragraph 5.4.9 of the SAR which rather dismissively considers the benefits to be derived from the proposed strategy for Long Stratton. Paragraph 4.33 of PPS12 contends that a core strategy should seek to devise a policy framework to deal with "the particular issues which have been identified as of local importance." Furthermore, paragraph 4.37 of PPS12 states that the evidence base should contain two elements, one of which relates to participation, and a recognition of the views of the local community and others who have a stake in the future area. As paragraph 5.4.9 of the SAR observes, a bypass at Long Stratton "is strongly desired in order to reduce through-traffic and so bring about environmental improvements. The evidence does point to existing problems of environmental quality in the centre of

Joint Core Strategy Proposed submission Document

O - 11514 - 8591 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii

11514 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Long Stratton, particularly in terms of air quality and so there is some certainty that a bypass could lead to significant benefits." We fundamentally disagree with the comments to be found at pages 138 and 142 of the SAR which suggest that "it does not appear" that Long Stratton is well linked to a strategic employment location. However, page 141 states that "there are two major employers located within Long Stratton, and there will be further ancillary employment development as part of the growth strategy." Equally page 142 of the SAR contains the observation that "a good range of services, facilities and employment opportunities do exist in Long Stratton and this will be expanded as part of the growth strategy." Many of the negative conclusions regarding Long Stratton to be found in the SAR are based upon speculation rather than a proper evaluation of the information available. We would note the comment at page 143 of the SAR that "it is important to point out that for a village of its size there is a good range of existing services, facilities and employment opportunities and that this range will see ancillary growth as part of the housing-led growth strategy."

Joint Core Strategy Proposed submission Document

O - 11524 - 7653 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii

11524 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary:

Policy 10Nfk Constabulary considers that all new development will require an increase in police resources. The main direct areas of impact relate to increasing the size of safer neighbourhood teams and enhancing response and protective police services (examples of protective services are adult and child protection and domestic violence units). Other ancillary impacts will be on levels and investigation of serious crime, custody capacity and Nfk Constabulary support services

Joint Core Strategy Proposed submission Document

S - 11533 - 8591 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11533 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We concur with Policy 10 which anticipates that each major development location in the NPA will achieve a high level of self containment whilst integrating well with neighbouring communities. Furthermore, the proposed locations will be designed around walking and cycling for local journeys and public transport for longer journeys. These significant considerations can readily be achieved at Long Stratton as new development located between the proposed bypass and the eastern side of the existing built up area can be masterplanned to effect a beneficial integration with the existing community. We endorse the observation at page 65 of the PSD. Furthermore we support the proposition that the expanded community will accommodate at least 1,800 dwellings. We agree with and will participate in the implementation of the various elements required to arise in conjunction with further growth at Long Stratton. The construction of a bypass to the east of the settlement will provide the opportunity to effect improvements to the town centre, including traffic management, environmental enhancement and expanded commercial facilities. Additional local employment opportunities will arise and the design and location of the proposed expansion area will achieve appropriate investment in the creation of a strategic green infrastructure corridor. Long Stratton already benefits from a high quality public transport service and the planned growth of the settlement will include transport improvements, incorporating bus priority at the A140/A47 junction. We endorse the approach described at paragraph 6.13 of the PSD. It is essential to provide a range of growth locations to achieve a reasonable level of choice. Paragraph 6.12 acknowledges that the East of England Plan requires that much of the growth should be located in the NPA and in that particular policy context it is entirely appropriate to direct further housing and employment growth to Long Stratton. We have noted the comment at paragraph 6.13 of the PSD. We are in agreement with the proposition that it will be beneficial to adopt "a whole settlement approach to the development of Long Stratton to maximise the number of local trips on foot or by cycle." The masterplan process described in policy 10 will enable the required "whole settlement" procedure to deliver a strategy for the town which facilitates an enhancement of existing community/commercial/retail facilities. We are in agreement with paragraph 6.16 of the PSD which states that the JCS promotes development at Long Stratton. The construction of a bypass at Long Stratton will secure substantial benefits for the existing community as a result of the removal of through traffic from the centre of the settlement. As noted at paragraph 6.13 there are significant "local benefits of a development-led bypass."

Joint Core Strategy Proposed submission Document

O - 11545 - 8597 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - iii

11545 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living supports the allocation of Old Catton, Rackheath, Thorpe St Andrew growth triangle in the delivery of growth fro Greater Norwich. It OBJECTS to certain policy details contained in teh bullet-point section of Policy 10. It fails to acknowledge that Wroxham Road will be a Bus Rapis Transit (BRT) route. Significant growth in NE Norwich will need to be accompanied by comperhensive public transport coverage and as such the implementation of BRT on Wroxham Road is essential to securing significant growth in this area. The current BRT proposals which do not cover Wroxham Road are not considered to provide sufficient coverage in respect of either the existing population to the north east od Norwich or for the potentiial growth in hte area. there is a significant gap in BT coverage, between Salhouse Road and the A140 to the west anas such one of the largest single residential catchment areas in Norwich will not be accessible to the propsoed BRT. It is considered that the current BRT proposals therefore fail to focus sufficiently on the existing travel demand areas and do not provide adequate coverage to promote increased bus usage and reduce vehicular trips in this area. Blue Living also have a concern with regard to the supporting text under the sub-lheading of 'key Dependencies' Reference will be made on this subject in other submissions made bu Blue Living, however it is considered that the delivery of growth will be dependent uopn innovative, flexible and comprehensive approach which makes the best uses of available resources, policy frameworks, delivery vehicles and private sector initiatives. The concern is that comments made to the 'masterpalnning process and ongoing managment by the GNDP' suggest that public sector control rather than dynamic partnership. Any proposals brought forward will need to have a well considered and detailed evidnce base to support a masterplan or masterpalns. Blue Living believes taht a more co-ordinated approach using both public and private sector resources represnts a more felexible response to delivering growth. The locations for growth should also put greater emphasis on ; Green infrastructure and environmental initiatives, the quality fo place, walkable and cyclable neighbourhoods, realistic and integrated levels of mixed use, flexible forms and types of housing

Joint Core Strategy Proposed submission Document

O - 11557 - 8603 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11557 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: B Lanmar 1 LLP [8603]

Agent: Woods Hardwick Planning (Mr Tim Collie) [7449]

Full Text:

Summary:

We support the provision of Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle and the construction of the Northern Distributor Road and the provision of at least 7,000 dwellings rising to 10,000 after 2026 as it is in line with regional targets. The Policy states 'the structure of the local geography suggests that a community will take the form of a series of inter-related new villages' however this approach appears too simplistic. This policy should recognise that at present the Historic Parkland associated with Rackheath Hall covers a large part of the growth area, which represents a considerable constraint in the context of the need to raise the number of dwellings to 10,000. It would in addition make it difficult to provide greater permeability and community integration to the areas on either side of the NDR as outlined in the policy. The value of the Historic Park will be severely harmed as it will be bisected by the NDR and will have diminished historical importance and amenity value.

Joint Core Strategy Proposed submission Document

S - 11558 - 1998 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11558 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Easton Parish Council (Mr J H Witcombe) [1998] Agent: N/A

Full Text:

Summary: Easton Parish Council accepts that it is likely to become one of the growth areas around Norwich. We would want to be involved in every aspect of development in and affecting Easton e.g. There is a question of whether the Bus Rapid Transit route to the City Centre via Dereham Road should include Easton. We have been campaigning for years for a pedestrian/cycle link from Easton to Longwater. Links to Longwater are said to be in the plan but they they include Easton?

Joint Core Strategy Proposed submission Document

O - 11562 - 8268 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11562 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: RSPB (East of England Regional Office) (Dr Philip Pearson) [8268] Agent: N/A

Full Text:

Summary:

Section 4.1.10 sustainability report states that in assessing the JCS some uncertainty exists '...regarding how these policies will be implemented on the ground, or where there were gaps in the evidence base'. The SA suggests that this uncertainty should be addressed with '...recommendations regarding how effects can be considered in the future at the earliest possible stage (e.g. through other LDF documents or at the project planning stage).' We are concerned by this approach: deferring important decisions in adverse effects on Natura 2000 sites creates uncertainty over the delivery of the plan, again calling its soundness into question. based on the spatial information provided in support of the Core Strategy and those of neighbouring Councils, we believe that a more rigorous cumulative and in-combination assessment is possible at this stage and must be undertaken. It is of concern that from Policy 1 and 2 (p51 & 52 of the SA) that 'the emphasis on protecting international important biodiversity' be removed. This change is not appropriate and the policy approach taken to Natura 2000 sites must not be weakened. Consequently we recommend maintaining the policy wording from Natura 2000 sites and expanding policy wording to include a level of protection for sites of local conservation interest that is compatible with the requirements of PPS9: Biodiversity and Geological Conservation. In addition on p62 of the SA it is suggested that 'it may be wrong to assume that access to a major orbital road - the proposed NDR - on the door-step of the development will lead to on-going car dependency'. We note that this assertion is not supported by evidence either in the JCS, SA or the Transport Report. In the absence of evidence clearly demonstrating that this approach is correct we consider that the appropriate way forward is to assume that the construction of a major orbital road WILL lead to an on-going car dependency.

Joint Core Strategy Proposed submission Document

O - 11564 - 7209 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11564 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Alex and Peter Valori / Faircloth and Baker [7209] Agent: Keymer Cavendish (Mr E. J. Keymer) [4187]

Full Text:

Summary:

This representation, in relation to Policy 10, supports the concept of the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle. We do, however, believe it makes the Plan unsound to state that 'delivery is dependent upon the implementation of the Northern Distributor Road.' This statement is made on the first page of Policy 10 and repeated in Para. 6.18. With the likely cut in government expenditure, a way needs to be found of continuing to deliver housing, even in the possible absence of a Northern Distributor Road. Keymer Cavendish represents the landowners who control the likely route of the Inner Relief Road between Plumstead Road and Salhouse Road. The attached brochure, submitted to Broadland District Council in May 2009, shows how a sustainable community numbering some 1,700 houses together with a primary school, local facilities and modest employment could, at the same time, provide the 'missing link' of the Inner Relief Road between Salhouse Road and Plumstead Road. The northern and southern sections of this road have already been required under the provisions of existing or proposed planning permissions. This demonstrates that infrastructure can be delivered under separate cohesive planning consents. By providing a private-sector funded Inner Relief Road (IRR), delivery would no longer be dependent on the implementation of the Northern Distributor Road and Policy 10 would then be sound. It is stated in Para 6.17 that there must be a clear commitment to fund and implement key infrastructure, as identified in the Policy, before land is released for major growth. This 'woolly' statement does not say by whom this commitment should be made. If this factor is vital, there should be a clear list stating: 1. Necessary infrastructure 2. The body responsible for delivering it. Under the heading of Delivery in our May 2009 submission to Broadland District Council we state in Para 6.1: The concept of this 7,000-8,000 development is probably the largest ever seen in and around Norwich and it is understandable why the planning authorities should prefer to deal with one application to cover the whole scheme. However, this aspiration will not necessarily optimise the prospect of early delivery. The recent change in fortune of the property market and the construction industry has made it more important than ever to think carefully as to how major strategic developments can be delivered within the constraints of reduced availability of bank funding, reduced house prices/land values and a general reduction in confidence. Timely delivery will result from a team effort between the planning authorities and delivery partners, built on a full understanding of sites and market conditions, albeit that, hopefully, conditions will improve in the years ahead. Other growth locations within Policy 10: we question the sustainability of developing in the dormitory villages/towns outside Norwich. In particular, we question whether locations such as Hethersett and Long Stratton, which have no rail links, are able to provide sustainable communities, rather than simply to aggravate Norwich commuter traffic. It seems far more sustainable to consolidate Norwich to the north-east, to the west at Costessey and to the south-west at Cringleford.

Joint Core Strategy Proposed submission Document

O - 11567 - 7463 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11567 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: GO East (Ms Mary Marston) [7463]

Agent: N/A

Full Text:

Summary:

Policies 9 - Strategy for growth in the Norwich Policy Area - and 10 -Locations for major new or expanded communities in the Norwich Policy AreaKey dependencies4. National policy for transport is seeking to move the focus away from the 'predict and provide' approach of the past and to focus on the challenge of delivering strong economic growth while at the same time reducing greenhouse gas emissions, (see DfT guidance on 'Delivering a Sustainable Transport System - 'DASTS', published in November 2008). This now provides the policy context for the third generation of Local Transport Plans, and more generally informs our consideration of proposed transport policies and priorities, as articulated in emerging core strategies. 5. We welcome the strengthened commitment to the development of new and expanded communities which 'will be highly sustainable with good access to local jobs...and local centres...and facilities easily accessible by foot, bicycle and public transport'. The inclusion of this statement in the vision is echoed elsewhere in the plan: the commitment to reducing travel need and impact (Objective 7), to minimising contributions to climate change (Objective 1 and Policy 1), and to promoting more sustainable travel choices by delivering a package of measures considered necessary to support growth across the Norwich Policy Area (NPA), as identified in the Norwich Area Transportation Strategy (NATS).6. Transport priorities listed under Policies 9 - Strategy for growth in the Norwich Policy Area - and 10 - Locations for major new or expanded communities in the Norwich Policy Area - include:* Construction of the Norwich Northern Distributor Road (NDR);* BRT via Salhouse Road to the city centre;

* safe and direct cycle and pedestrian routes, orbital bus services to Broadland Business Park, Rackheath employment area, airport employment areas and surrounding countryside; permeability across the NDR;* new rail halts at Rackheath and Broadland Business Park;However, Policy 10 identifies development as dependent only on the NDR, and supporting text (para 6.7) to Policy 9 states 'the NDR is the fundamental part of the Norwich Area Transportation Strategy (NATS) and this growth strategy'. 7. Whilst it is argued that significant improvements to bus, cycling and walking networks can only be achieved with the road capacity released by the NDR (page 7, and paras 3.11 and 5.44 refer), we question the over-riding priority given to construction of the NDR, and whether this is consistent with the commitment in Policy 1 to 'give priority to low impact modes of travel'. We note the indicative timings for the delivery of sustainable transport interventions set out in Appendix 7 and our concern is that existing road based travel patterns will be reinforced, whilst a more robust approach to demand management is deferred. 8. In addition, we understand that modelling of dependant development has been undertaken to support the NDR business case which suggests that, whilst the NDR would facilitate access to growth locations, some development in the North East of Norwich could proceed ahead of the NDR. 9. Similarly, growth at Wymondham, Hethersett, Cringleford and Eaton/ Costessey is identified as dependent on significant investment in road infrastructure, whilst investment in sustainable transport modes will need to be delivered in tandem with development. Again, we question the justification for a 'sequential approach' to transport infrastructure required to support growth locations in South Norfolk, more particularly because the NATS modelling evidence suggests only a weak relationship between the NDR and congestion relief in the south of Norwich. 10. We comment further on infrastructure delivery in our representations on Policy 20 - Implementation and Monitoring - below, but in summary, our principle anxiety is that the time frame for the delivery of sustainable transport interventions is loaded towards the latter part of the plan period, when funding is less certain. We would encourage the Partnership to identify opportunities to 're-balance' the transport strategy, for example by ensuring that the Local Transport Plan and the NATS Plus Implementation Plan prioritise low impact modes of travel and make optimal use of the available funding. Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle11. Policy 9 - Strategy for growth in the Norwich Policy Area - identifies the growth triangle, including Rackheath, for large scale growth - 7000 dwellings to 2026, rising to 10,000 by 2031. The spatial vision states that 'inspired by the exemplar eco-community at Rackheath, zero carbon development will be the standard to be achieved through advances and innovation in the design, construction and management of sustainable communities and new buildings which improve energy efficiency and use renewable energy'. 12. In supporting text to Policy 9, para 6.6 states that 'the growth triangle incorporates land at Rackheath being promoted for an eco-community under the governments Eco-towns programme and development of the rest of the area will be expected to reflect similar high standards'. Elsewhere, design standards and requirements for master planning (Policy 2), and thresholds for compliance with the Code for Sustainable Homes (Policy 3) apply throughout the plan area. 13. Policy 10 - Locations for major new or expanded communities in the Norwich Policy Area - states that development will achieve the highest possible standards of design. Supporting text (para 6.14) states that 'A large part of the development at Rackheath is promoted as an eco-community under the Government's eco-town programme. The Rackheath eco-community will remain part of this strategy even if the Government programme falters'.14. None of the above policies refer explicitly to the eco-town PPS, and that neither Policy 9, nor Policy 10, appears to set higher standards for Rackheath than for the rest of the NPA, although read together, supporting text to both policies suggest that standards set for the Eco-town at Rackheath are expected to apply across the growth triangle. To avoid ambiguity, a clear and consistent statement of policy in relation to development standards expected for Rackheath, the growth triangle, the NPA and the plan area as a whole, is required. In addition, your submission draft should clarify whether you intend to prepare an Area Action Plan for the growth triangle.

Joint Core Strategy Proposed submission Document

O - 11577 - 8018 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - ii

11577 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: Policy 10 on page 63 envisages 'stepping stones' of reclaimed heathland linking 'Mousehold Heath to the surrounding countryside'. For stepping stones to be effective, the distance between them has to be kept to an absolute minimum. There is also the point that for heathland to be self sustaining and of true biodiversity value, it needs to cover a relatively large uninterrupted area. There is already an extensive built up area between Mousehold Heath and the countryside with no such large unused open spaces. Further, recent revisions to the Strategy show a more complete joining up of development between Rackheath and the main Norwich urban area which throws into question whether the stepping stone concept, at least as a link with Mousehold Heath, is realisable.

Joint Core Strategy Proposed submission Document

O - 11585 - 7738 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11585 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Anglian Water (Mrs Sue Bull) [7738]

Agent: N/A

Full Text:

Summary: Section 6.13 This section states that these development locations have been selected because they do not compromise high quality habitats or flooding. As stated above the Draft Water Cycle Study Stage 2b report has identified significant constraints to the proposed development allocations on the grounds of environmental capacity. Section 6.29 confirms that parts of the city centre are within zone 2 flood risk areas and more detailed studies will be undertaken. Section 6.22 Whittingham WwTW is mentioned as requiring improvements to maintain environmental conditions, but improvements may well be required at other WwTWs. Anglian Water are keen to continue to build on the positive relationship with the GNDP.

Joint Core Strategy Proposed submission Document

O - 11602 - 8203 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11602 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Country & Metropolitan Homes - formerly Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes notes that Policy 10 sets out the locations for the major new and/or expanded communities within the Norwich Policy Area of which includes the strategic expansion of Hethersett. C&M Homes objects to Policy 10 as it fails the Justified and Effective soundness tests for the following reasons: Justified - The proposed strategic growth in Hethersett is limited to at least 1000 homes. This allocation is not underpinned by credible or robust evidence as this strategy is a significant change from the initial spatial strategy which was underpinned by robust evidence which demonstrated that up to 4,000 units could be accommodated within Hethersett in order to achieve a viable sustainable development. Effective - In order to ensure delivery of the strategy, the enabling time associated with bringing forward a strategic growth location of at least 1000 units could delay delivery in this location until at least 2014. In order to ensure delivery of the housing targets proposed in the strategy, C&M Homes opinion considers that smaller sites within locations such as Hethersett could be delivered earlier in the plan period for development on sites capable of delivering up to 200 units. Therefore C&M Homes considers that in addition to the strategic growth in settlements like Hethersett, further clarification is required on how the 1800 allocation to 'smaller South Norfolk sites' within the NPA will be distributed. Currently with growth locations like Hethersett, sites are available i.e. Land at Great Melton Road, Hethersett which can deliver housing within existing constraints in advance of the programming and completion of the strategic infrastructure required to deliver the strategic growth locations.

Joint Core Strategy Proposed submission Document

O - 11612 - 1823 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i

11612 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: **Salhouse Parish Council (Mrs D Wyatt) [1823]** Agent: **N/A**

Full Text:

Summary: The Standard of Development will be to the highest possible standard according to the highlights in the front of the document with phrases like zero carbon development and yet we see that assertion being watered down within the text where lower standards are described even in the area of the so called eco- community. It is also clear that the building of 10,000 dwellings in the so-called growth triangle will completely alter the unique countryside which exists to the North East of Norwich and which is also a historic heath. Some of these housing developments are projected to contain three and four storey high buildings. This would be completely alien to the character of a rural community and marks an excessive urbanisation of this tract of land. Neither of these constitute a high standard of development nor could it easily be described as an ecological beacon of excellence.

Joint Core Strategy Proposed submission Document

S - 11628 - 7523 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11628 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary:

The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development. Regional policy supports proposals for the Norwich Northern Distributor Road (NNDR). The East of England Plan Panel Report (published in June 2006) stated that development of the NNDR is 'essential to improve the quality of life in residential areas, aid rural regeneration ... and facilitate urban expansion'. Urban growth policies of the JCS are consistent with this approach. Development of the NNDR is currently scheduled for pre 2013/14. Improvements to the A11 and A47 are under consideration. Provision of a bypass on the A140 at Long Stratton is not currently included in regional transport objectives. The possibility of combining waste management with production of renewable energy should be promoted as proposals are developed. Policy WM8 advises local authorities to introduce innovative waste management schemes, particularly within growth areas, within new development.

Joint Core Strategy Proposed submission Document

O - 11643 - 8610 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11643 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Royal London Mutual Insurance Society Limited Agent: Savills(Manchester) (Mr Tim Price) [4303]
[8610]

Full Text:

Summary:

Policy 10: Locations for major new or expanded communities in the Norwich Policy Area Policy 10 sets out that Easton/Costessey is a location for the above. The Retail Park is located within this area and we support this decision by the GNDP. This is consistent with recent permissions for a major urban extension of the area. We note that 'enhanced local services' will be required. The Retail Park along with the associated supermarket provide an existing opportunity to provide enhanced local services in what is a sustainable and accessible location for this area. The Policy states that 'safe and direct cycle and pedestrian access to Longwater employment and retail area' will be provided. In doing so, the GNDP acknowledges the importance of the role that the Retail Park can provide to the area in meeting local needs. We consider though that this acknowledgement should be more explicit in the Policy and confirm our request for it to contain detailed information about this role. We consider that appropriate text for the Policy should be as follows: 'This location is dependent on capacity expansion of the A47 Longwater junction and will provide:*

Opportunities for the consolidation and enhancement of Longwater retail area to support the existing role that it plays in meeting the retail requirements of the area.'

Joint Core Strategy Proposed submission Document

O - 11658 - 8366 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11658 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. We support the recognition of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle as a major growth area (paragraph 1). In previous representations, the BLT have highlighted their commitment to masterplanning collaboratively with relevant stakeholders, including the local community. This includes the coordination of a range of public and private sector organisations to ensure the delivery of appropriate infrastructure to support growth. In addition the BLT has the following comments:

- * Bullet 5 on page 63 states that to facilitate the early provision of educational facilities, the early phases of development will concentrate on family housing. It is considered that this statement is overly onerous as it could threaten the viability of development and therefore the delivery of the strategy. It is therefore considered that the last sentence of bullet 3 on page 63 be deleted.
- * Bullet 5 on page 63 refers to the significant levels of heath land re-creation to provide stepping stones to link Mousehold Heath to surrounding countryside. Again, it is considered that this is an overly onerous policy statement that is not supported by a robust and credible evidence base. No feasibility or cost analysis has been undertaken by the GNPD to ascertain if this is possible or manageable in the long term and it may be concluded that heathland is inconsistent with the public access and sport/leisure requirements of an urban fringe location. As such, it is considered that this statement is removed from bullet 5 on page 63 of the Core Strategy.
- * Bullet 5 (page 63) also proposes the blanket retention of existing greenspaces. This is contrary to the ambition of masterplanning to optimise land use within the masterplan area where the suitability of each area will be looked at on its merits in terms of how it contributes to the overall masterplan, the broad objective of walkability and in terms of viability. We therefore propose that the provision is reworded as follows 'the creation of range of linked open spaces through a comprehensive landscape framework'.
- * As stated above, the JSC, including this policy, does not recognise the inner link road raised in previous representations made by the BLT. It is considered that a reference to the inner link road be included to enable the early delivery of the strategy and to ensure that the strategy is both deliverable and flexible. This should also be mentioned in the supporting text (paragraph 6.18) as whilst it is recognised that the NDR is a fundamental requirement for the level of growth that is expected in the GNPD area, it is considered that the provision of an inner link road could support a sustainable urban extension to north east Norwich in advance of the NDR. It is noted that paragraph 6.14 states that an Area Action Plan is being developed for the major urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle. However, BLT consider that the Core Strategy provides an adequate policy and delivery framework (subject to the amendments suggested in these and previous representations) to successfully enable the delivery of major growth in North East Norwich as the Old Catton/Sprowston/Rackheath/Thorpe St Andrew Growth Triangle has been allocated in the Core Strategy (policy 10 and Appendix 5). It is recognised that further guidance will be required to expand on how to take forward the policies in the Core Strategy. However, it is considered that a Planning Brief in the form of a Supplementary Planning Document for the growth triangle would be sufficient in this regard in particular if based on the outcome of a collaborative master planning process. The policy concludes with the view that a single co-ordinated approach will be required across the growth triangle. Whilst the BLT consider that coordination is an obvious requirement of the delivery strategy, at this stage there has been insufficient discussion and exploration of business models with the respective private sector promoters within the growth area and it would be premature to conclude that a single approach to delivery is desirable or indeed viable... As such, the BLT would request that the word 'single' is removed from the last paragraph of the page 63.

Joint Core Strategy Proposed submission Document

O - 11667 - 8511 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii, iii

11667 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

We object to paragraph 6.13, as it is inconsistent with the Sustainability Appraisal, and also previous comments on the appropriateness of locating development in Long Stratton. This paragraph claims that: 'While Long Stratton is not as well related to employment or high quality public transport this is outweighed by the availability of a good range of local jobs, services and other community facilities and the significant local benefits of a development-led bypass.' This contrasts sharply with the GNDP's conclusions at Appendix 4 of their Issues & Options consultation document: 'Long Stratton provides a range of local services and some local job opportunities. It is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time.' This view is supported by the Sustainability Appraisal, which notes: 'At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long-Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away).' (SA, page 58) In light of these conclusions, it is unclear how it will be possible to take a 'whole settlement approach to the development at Long Stratton to maximise the number of local trips on foot or by cycle.' This is a glib statement, which is not supported by the technical evidence base, or the GNDP's initial stance. This comment must be justified by a robust evidence base, and a clear mechanism indicating how it will be achieved; if this cannot be done, it should be deleted.

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O - 11673 - 8511 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii, iii

11673 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

The Sustainability Appraisal for the Core Strategy demonstrates that the most appropriate option for development ('Option 1') is one which locates 4,000 new dwellings in Wymondham and none in Long Stratton. There are sound reasons for this, and we believe that the Core Strategy, which follows the less sustainable approach outlined in the SA's 'Option 2', has disregarded broad sustainability benefits in favour of narrow local concerns. The approach taken represents a compromise on the sustainable form of development offered by development on the A11 corridor, with the more narrow aim of delivering a new bypass for Long Stratton. This approach would result in a highly unsustainable form of development at Long Stratton, which would not be of benefit to the Core Strategy area as a whole. Paragraph 6.1 of the Core Strategy notes that the East of England Plan identifies Norwich as a Key Centre for Development and Change, and that the Norwich Policy Area is identified as the location for the growth related to Norwich. Paragraph 13.68 of the East of England Plan describes the Norwich Policy Area as 'the urban area, the first ring of villages and the market town of Wymondham'. This description does not appear to include Long Stratton, which is a village somewhat removed from the rest of the Norwich Policy Area. There appears to be no justification in terms of regional policy for the significant allocation which is proposed at Long Stratton. Benefits of Clustering Development in the A11 Corridor The Core Strategy aims to bring a number of benefits to the A11 corridor at Wymondham, Hethersett and Cringleford. These include new high quality sustainable transport links, as well as the enhancement of local services and facilities, and a potential reduction in commuting trips to Norwich through increased self-sufficiency. Potentially the most important of these benefits is the delivery of a new Bus Rapid Transit service to Norwich. We believe that a high quality public transport link such as this could help to make future development in this area truly sustainable, as it would complement the good bus and rail service which already exists, and provide a truly viable alternative to the private car. However the Sustainability Appraisal of the Core Strategy notes that the level of development allocated to these settlements (4,400 dwellings) 'is at the borderline of providing a potential market sufficient in size to support the development of a Bus Rapid Transit service. Increasing the total housing allocation for to 5,000 would provide greater comfort regarding the market potential for BRT on this corridor.' (SA, para 2.2.58) It is therefore clear that it would be desirable to allocate additional development to the A11 corridor, to ensure the delivery of essential infrastructure. Clustering development in the settlements on the A11 corridor, and particularly in Wymondham, will also bring local economic and sustainability benefits. The Core Strategy notes that Wymondham is the only main town with significant capacity for growth. While Wymondham currently loses trade to Norwich, the proposed expansion of employment and retail development, as well as local services and facilities, will help to make it more self-sufficient. It will be better able to serve the needs of its population, and that of the rural hinterland and adjacent settlements, thus reducing the need to travel to Norwich. The RSS identifies Wymondham by name as being a location for growth. Policy NR1 of the RSS also notes that the Wymondham/A11 corridor should be a focus for employment development, particularly high-tech development and rail related uses. The Sustainability Appraisal has demonstrated that Wymondham could accommodate a greater level of development, which would further enhance these benefits through improved local facilities and better public transport links. It also demonstrates that this would be a preferable option to the one proposed by the Core Strategy. Policy 9 should therefore increase the housing allocation for Wymondham, so as to enhance the inherent sustainability benefits which this aspect of the Core Strategy can deliver. Proposed Development at Long Stratton Local Views on the Proposed Development As noted above, Policy 9 allocates 1,800 dwellings to Long Stratton for the single purpose of delivering a new bypass. The Core Strategy refers to Long Stratton as a village, and notes that 'Stimulated by growth, commercial development may be sufficiently strong to begin to move the village towards Main Town status' (CS, page 82). The 2001 Census showed that Long Stratton had a population of 3,701 at that time. The Infrastructure Topic Paper estimates that the proposed 1,800 homes would bring in an additional 3,817 people to the village, effectively doubling its size. However, the Core Strategy does not appear to consider the potential impact on the character of the village. The representation by Long Stratton Parish Council to the Regulation 25 public consultation, earlier in 2009, also highlighted the apparent opposition of local people to the proposed development. This representation noted: 'It is apparent from the result of a survey undertaken by the Parish Council, via the Village Magazine, and views expressed by residents during a public participation period at a recent Parish Council meeting, that two thirds of those responding and giving views are against the proposal, with only one third of those responding being in favour of the number of new homes proposed and then only conditional upon a Long Stratton Bypass being in place first. Having considered the views of residents and debated the matter, the Parish Council objects to Option 0 and cannot support the proposal.' The Issues and Options Report of Consultation also notes that: 'Whilst the Long Questionnaire gave results in favour of growth to provide a Long Stratton bypass, the local survey (undertaken by South Norfolk District Council) indicated that local people are evenly divided for and against such a solution. Only a minority of local people would support a development in excess of 1,500 dwellings.' In light of this evidence, it is not clear on what basis the bypass is being proposed. Any local benefits it will bring appear to be of less concern to many of the local residents than the likely negative effects. Technical Evidence Base Whilst the Sustainability Appraisal notes that the Long Stratton bypass would bring local benefits in terms of improvements in air quality, when viewed in the context of the Core Strategy as a whole, it is clear that it is not the most appropriate use of limited resources. Page 9 of the Core Strategy refers to the balance which the document has sought between 'technical evidence against the preferences of local communities', noting that the Long Stratton bypass has been proposed on the basis of the latter of these two issues. While the comments of the Parish Council appear to contradict this assertion, the Sustainability Appraisal is explicit in pointing out that the proposed bypass is not supported by the technical evidence either: 'However, one of the major growth

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locations - Long Stratton - does stand out as being less suited to encouraging more sustainable patterns of travel. This relates to the fact that Long Stratton is geographically isolated from Norwich and major employment locations in comparison to the other major growth locations; and to the fact that there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. This is undoubtedly a significant negative effect of the spatial strategy, and probably the key issue that has been highlighted through this SA. (SA, page VIII) Objective 7 of the Core Strategy aims to reduce the need to travel, particularly by private car, through the location and design of new development. It also aims to provide sustainable modes of transport as an alternative to private cars. These aims are consistent with the guidance set out in national planning policy documents such as PPS1, which seeks to direct development to locations which will 'reduce the need to travel' (PPS1, para 23, point vii). Key Principle (ii) of PPS1 suggests reducing carbon emissions through 'encouraging patterns of development which reduce the need to travel by private car' (PPS12, para 13, point ii). The proposed Long Stratton bypass would be contrary to these aims. It would make the route more attractive to motorists due to improved journey times, with the likely result that traffic would increase as it was used for less essential journeys. Long Stratton also lacks suitable public transport connections, and so the many new residents (estimated in the Infrastructure Topic Paper to be 3,817 people) would simply add to this increase in car traffic, as they travelled to higher order settlements (particularly Norwich) for employment and key services. The Core Strategy notes that much of the existing transport network is currently operating at 90% of its capacity. However, it does not appear to consider the direct effect which the proposals for Long Stratton will have in increasing traffic on the roads in and around Norwich, and how this will relate to its other proposals. A further concern with regard to locating development in Long Stratton is that it is currently relatively isolated from many sources of employment, and the proposals in the Core Strategy will not remedy this situation. While the Core Strategy has considered the larger settlements, such as the Main Towns, to be suitable locations for strategic employment growth, Long Stratton is referred to as a village, and has clearly not been considered either sufficiently well connected or of a sufficient scale to include such an allocation. Any new development in Long Stratton will continue to be isolated from sources of employment, therefore generating unsustainable commuting patterns. The Sustainability Appraisal supports our conclusions in its summary of the effects of Policy 9, noting: 'At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long Stratton in particular, will preclude the opportunity for the new development to lead to sustainable patterns of transport. Long Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away).' (SA, page 58) This appears to echo the GNDP's conclusions at Appendix 4 of their Issues & Options consultation document: 'Long Stratton provides a range of local services and some local job opportunities. It is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time.' The SA also noted the contrast between the 'local level benefits associated with growth at Long Stratton' and the 'more strategic disbenefits' (SA, page VIII). Implications for the Funding and Delivery of Infrastructure The Core Strategy notes that the Long Stratton bypass is a prerequisite for development in the village. The 2008 Regulation 25 draft of the Core Strategy noted that Long Stratton could only accommodate in the order of 20 - 50 dwellings prior to the completion of the bypass. Core Strategy is not clear on where the funding for the bypass will come from, other than vague statements that the new housing is intended to pay for it. The Infrastructure Topic Paper outlines the need for a huge amount of new infrastructure across the Norwich Policy Area, in order to deliver the development proposed in the Core Strategy. The Core Strategy itself notes that 'the cost of the infrastructure required is likely to exceed the expected income from all sources' (para 7.4). The Infrastructure Topic Paper also notes that in excess of £112 million will be required to deliver the proposed development in Long Stratton (a figure which is somewhat higher than the £35 million estimated to be required to build the bypass alone). If this funding is to be drawn from a central pot, it is likely that either these or other competing infrastructure projects will be delayed or even abandoned. Alternatively, if development at Long Stratton is to be self-funding, the cost of borrowing over the (minimum) ten year period which the bypass, housing and associated development would take to build, could effectively double the overall cost of the necessary infrastructure. Given the apparent scarcity of funding for the ambitious proposals outlined in the Core Strategy, it is also unclear on what basis the proposed development in Long Stratton can be justified. The Core Strategy does not appear to promote any evidence to support of the need for development in the town, other than in order to fund a bypass. The Core Strategy does not set out the context of the high price this will require in relation to the limited local benefits it will bring. It is also unclear from the information made available by the GNDP how the apparent funding problems will be resolved, and with what certainty the Core Strategy can claim that the proposed 1,800 home development at Long Stratton will fund the £112 million cost of the necessary infrastructure. Where Core Strategies rely on the delivery of infrastructure, PPS12 requires them to provide evidence of 'who will provide the infrastructure and when it will be provided' (PPS12, para 4.8). This should be set out in terms of: 'infrastructure needs and costs; phasing of development; funding sources; and responsibilities for delivery.' (PPS12, para 4.9) PPS12 also notes that Core Strategies should make 'proper provision for... uncertainty and... not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning - showing how the objectives will be achieved under different scenarios - may be necessary in circumstances where provision is uncertain.' (PPS12, para 4.10). We are also concerned that the high cost of the bypass will result in a reduction in the other essential infrastructure which can be delivered in Long Stratton. In its summary of the three growth options tested, the Sustainability Appraisal suggests that the 'Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.' (SA, page 39). In contrast, the Core Strategy repeatedly implies that this will not be the case. We are therefore concerned that the Core Strategy is not only inconsistent with the recommendations made by the Sustainability Appraisal, but in fact makes statements which are contrary to its

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conclusions (we have addressed some of the more profound inconsistencies in separate representations). We have also noted the comments of the Chairman of South Norfolk Council's Cabinet, and Leader of the Council (from the 25 September 09 meeting which approved the Pre-Submission Core Strategy), who made the following comment in relation to a proposed summary of the Core Strategy: 'He added that the summary of the Strategy needed expanding to emphasise the stepwise nature of the proposed development and clearly link the provision of infrastructure to homes. The summary would also need to acknowledge that a large proportion of the 57,500 new homes referred to were speculative and would not be delivered by 2031.' This view, from the Leader of South Norfolk Council, casts doubt on whether the development in the Core Strategy can be delivered. We would suggest that the proposed development in Long Stratton is particularly at risk of not being delivered, and greater certainty of delivery could be achieved by locating this development in Wymondham. Proposed Alternative Strategy Significant savings could be achieved through reallocating the 1,800 dwellings currently apportioned to Long Stratton to Wymondham. Wymondham is the closest Main Town to Norwich, and the only one which would be linked by a Bus Rapid Transit service to Norwich. It is the most sustainable location for additional growth outside Norwich itself, and the sustainability Appraisal has already concluded that it is well suited to accommodate this level of additional development. We believe that the development already proposed at Wymondham, including 2,200 dwellings, will deliver much of the infrastructure which would be required to fund this larger allocation of 4,000 dwellings. While it may be that infrastructure such as the new junction and slipway on the A11, new schools and healthcare facilities would need to be further enhanced, it is difficult to imagine that the additional cost would be anywhere near as high as the £112 million which the GNDP have estimated would be required for the proposed development in Long Stratton. This approach would significantly increase the certainty that the proposed development and essential infrastructure could be delivered, and in this way help to make the Core Strategy sound. As we have noted above, this strategy would also result in a more sustainable form of development. The additional development at Wymondham would help to ensure a new Bus Rapid Transit service which would provide a high quality public transport link between Wymondham and Norwich. This would supplement the existing public transport links, which are already good, and help to create a modal shift away from private car use in new and existing residents. Additional development at Wymondham would also help to further enhance the current employment, services and facilities in the town, and help to create a more sustainable and self-sufficient town, which could also better provide for the needs of the surrounding settlements.

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O - 11686 - 8352 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii, iii

11686 Object

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Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary: Please see comments under Policy 4

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S - 11692 - 8191 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11692 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Cemex [8191]

Agent: Drivers Jonas 6951 (Mr Ben Simpson) [8192]

Full Text:

Summary:

Nationally, CEMEX, owns a number of strategic sites, which are either due to, or already ceased being in operational use. In accordance with National Planning Policy, CEMEX are seeking to promote these sites for alternative uses. Within BDC, NCC, CEMEX wishes to promote two sites. The extent of these sites is shown on the attached plans and the addresses below: Kirby Lane, Leet Hill, Kirby Crane, Norfolk Lodge Farm, Bawburgh. Rather than comment on each policy separately, CEMEX considers it useful to highlight the key areas of support that would help meet the objectives for the development of its sites. In reference to the proposed "Settlement Hierarchy" detailed on page 55, CEMEX considers that distributing development evenly across the districts is sustainable. This would accord with Planning Policy Statement 7, paragraph 4. CEMEX supports the inclusion of Kirby Cane as a Service Village and agrees that land should be allocated for small-scale housing and employment development. CEMEX considers that the CEMEX Kirby Cane site could deliver sustainable development which would accord with Policy 15 and help to accommodate a proportion of the districts housing retirement. The southern Kirby Cane site would provide a natural sustainable extension to the existing settlement close to existing facilities and infrastructure, in accordance with National Planning Policy Statement 1 and Planning Policy Statement 7. CEMEX supports Bawburgh's identified location within the "Norwich Policy Area" and as such supports the consideration of "Other Villages" within the NPA for additional development, if necessary, to help deliver the smaller sites in the NPA allowance. The CEMEX Bawburgh site is a Greenfield site situated east of Bawburgh, next to Chapel Break. To the west of the site is the A47. The majority of the southern part of the site is within the Water Recreational Area policy BAW1 of the South Norfolk Local Plan (2007). In addition, the majority of the site falls within Flood Risk Zones 2 and 3. CEMEX therefore urges the Council to consider the sites potential for leisure related uses or for a water sports venue. This would accord with PPG:17 obj ii. Allocating the CEMEX Bawburgh for recreation would also accord with the Core Strategy, Area-wide Policy 1. CEMEX supports the identification of Kirby Cane as a "Service Centre" and request that the Council considers the site at Kirby Cane for residential use given its sustainable location adjacent to existing development. CEMEX supports the identification of Bawburgh as an "Other Village" and its location within the Norwich Policy Area. CEMEX urges the council to consider their site in Bawburgh for leisure related uses or as a future water sports venue due to its current allocation in the 2007 Norfolk Local Plan as being within the Norwich Policy Area and is identified as having the potential to accommodate a small proportion of the NPA housing requirement. The increase in population will therefore require appropriate leisure facilities to accord with PPG17. We trust that the representations above will be taken into account and on behalf of CEMEX we request that we be kept informed of progress with this and future LDF documents and wish to reserve our client's position to submit further representations on subsequent documents.

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S - 11696 - 8223 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11696 Support

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Respondent: Barratt Strategic/John Innes Foundation [8223]

Agent: CGMS Ltd (Mr Richard Atkinson) [7681]

Full Text:

Summary:

The Broadland, Norwich and South Norfolk Councils are currently preparing Local Development Frameworks (LDF) which will eventually supercede the adopted Local Plans. The Councils, together with Norfolk County Council, are consulting on the proposed submission for a Joint Core Strategy, which will form a key part of the LDFs.1.2 Building Partnerships is working with the John Innes Foundation and Barratt Strategic to promote the development of land in the south west of Norwich at Newfound Farm, Cringleford. The site lies within the undeveloped area bounded by Colney Lane, Round House Way, the A47 and the Norfolk and Norwich Hospital expansion lands.1.3 This representation supports the strategy for growth in the Norwich Policy Area as set out in Policy 9 and the inclusion of Cringleford as a location for a new or expanded community as set out in Policy 10. Newfound Farm is located in this growth area and is capable of delivering the proposed strategic allocation. However it is considered that, should the authority consider it appropriate, the scale of growth at Cringleford could be increased in order to make the most efficient use of the land and in accordance with the objectives of the Joint Core Strategy.1.4 A masterplanning exercise is under way which will demonstrate how Newfound Farm will integrate into the existing residential area, currently under development between Newmarket Road and Colney Lane, with the existing and proposed employment areas based around the Hospital and Norwich Research Park and with development being promoted by other parties on adjacent land. It will demonstrate the capacity of the site and confirm that it is capable of delivery at an early stage in the plan period, which will assist the authorities to meet their housing trajectory.PLANNING POLICY STATEMENT 1 - DELIVERING SUSTAINABLE DEVELOPMENT2.1 This policy statement sets out the overall aims and objectives of the Government in respect of Sustainable Development and the creation of sustainable communities.2.2 Paragraph 5 highlights that planning should facilitate and promote sustainable and inclusive patterns of urban and rural development by: making suitable land available for development in line with economic, social and environmental objectives to improve people's quality of life; contributing to sustainable economic development; protecting and enhancing the natural and historic environment, the quality and character of the countryside, and existing communities; ensuring high quality development through good and inclusive design, and the efficient use of resources; and, ensuring that development supports existing communities and contributes to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.2.3 The release of the Newfound Farm site for development is in accordance with PPS1, in that it would assist in the provision of housing to meet the needs of the area without compromising the natural and historic environment. The masterplanning exercise is being informed by studies including landscape, ecology and transport and the proposed layout of the site will respond positively to constraints which are identified. The site is bounded by development or strategic highways and would not therefore result in an intrusion into the surrounding countryside. It is located with good access to local jobs on the hospital complex and at the growing research park. The housing will be designed to minimise its carbon footprint, with, for example, construction in accordance with the higher levels of the Code for Sustainable Homes. The community will be well served by the existing high quality public transport services and will be planned to encourage walking and cycling. These factors will help to minimise carbon emissions, in accordance with the Climate Change supplement to PPS1.PLANNING POLICY STATEMENT 3 - HOUSING2.4 The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking: to achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community; to widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need; to improve affordability across the housing market, including by increasing the supply of housing; to create sustainable, inclusive, mixed communities in all areas2.5 In support of its objective of creating mixed and sustainable communities, the Government's policy is to ensure that housing is developed in suitable locations which offer a range of community facilities and with good access to jobs, key services and infrastructure. The area enjoys excellent access to existing and planned employment areas and will support the developing community facilities in and around Cringleford.2.6 PPS3 stresses the need to make the most efficient use of resources, including land. It follows that where a sustainable location is identified, such as at Cringleford, this should be developed in a way which will deliver the maximum benefits (in terms of capacity) commensurate with environmental and other objectives.2.7 In identifying broad locations for development, Local Planning Authorities are required by PPS3 to consider the contribution to be made to cutting carbon emissions from focusing new development in locations with good public transport accessibility and/or by means other than the private car. This is very much the case for this area which benefits from the high quality bus services which run to the city along Newmarket Road and which also serve the hospital and research park. Park and Ride facilities are also close at hand. PPS3 also requires local planning authorities to take into account any physical, environmental, land ownership, land-use, investment constraints or risks, such as physical access restrictions, contamination, stability, flood risk, the need to protect natural resources eg water and biodiversity and complex land ownership issues. No significant environmental constraints have been identified on the land in question and there are no complex land ownership issues which could delay development.2.8 To be considered developable, PPS3 notes that sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available for, and could be developed at the point envisaged. PPS3 places great emphasis on deliverability. If allocated for development, the deliverability of the Newfound Farm development is not in doubt, given the aspirations of the current owners.3. REGIONAL PLANNING POLICY EAST OF ENGLAND PLAN3.1 The East of England Plan was published in May 2008 by the Secretary of State for Communities and Local Government. It covers the county of Norfolk, as well as Suffolk, Cambridgeshire, Essex, Hertfordshire and Bedfordshire. Together with

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

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11696 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

relevant sections of the Milton Keynes South Midlands Sub-Regional Strategy, it constitutes the Regional Spatial Strategy (RSS) for the East of England. This RSS covers the period to 2021 but sets a vision, objectives and core strategy for the longer term. In particular it seeks to reduce the region's impact on, and exposure to, the effects of climate change and to put in place a development strategy with the potential to support continued sustainable growth beyond 2021. 3.2 One of the key ambitions of this RSS is to allow the region to accommodate higher levels of growth in sustainable ways. It does this in a number of ways including by focusing development on a group of significant urban areas, termed Key Centres for Development and Change in Policy SS 3 'Key Centres for Development and Change', together with the policies for the individual centres. Norwich is one of the key centres. 3.3 Policy NR1 states that Norwich should be a regional focus for housing, employment, retail, leisure, cultural and educational development. Particular aims, reflecting its identification as a new growth point, should be to: provide for 33,000 net additional dwellings in the Norwich Policy Area (NPA) in the period 2001-2021 facilitated by joint or coordinated LDDs prepared by Norwich, South Norfolk and Broadland - Newfound Farm lies within the Norwich Policy Area and can make a contribution to this growth, with a planned number of at least 1400 dwellings; achieve a major shift in emphasis across the NPA towards travel by public transport - Newfound Farm is well served by existing bus services which provide high quality and frequent links to destinations across the city. Concentrating development in this location will encourage the use and development of the public transport network; provide for employment growth in the NPA, including the Norwich Research Park and the A11/Wymondham corridor - the former site will be within walking distance of Newfound Farm and the A11 corridor and city centre will be easily accessible by means of the existing high quality public transport services. 4. JOINT CORE STRATEGY SPATIAL PLANNING OBJECTIVES 4.1 The Joint Core Strategy pre-submission document sets out the spatial planning objectives for the Greater Norwich area. These are quoted below, together with an assessment of the proposed development's impact upon them : 4.2 To minimise the contributors to climate change and address its impact - a high level of accessibility by public transport and the adoption of low carbon design standards will minimise greenhouse gas emissions. The site is not susceptible to flooding and will not therefore be subject to climate change impacts. 4.3 To allocate enough land for housing, and affordable housing, in the most sustainable settlements - Newfound Farm will provide for a range of housing types and will contribute to the target for affordable housing. Increasing the capacity of the site, over that proposed in the pre-submission document, will make sure land is used efficiently and will permit a sustainable community to develop at Cringleford, with a full range of housing, employment and services grouped together. Good access to public transport and local jobs means that the residential development will be sustainable from the outset. 4.4 To promote economic growth and diversity and provide a wide range of local jobs - the site is immediately adjacent to the strategic employment area around the Norfolk and Norwich University Hospital and Norwich Research Park which provide a wide range of existing local employment opportunities. The Joint Core Strategy proposes further employment development in this area. If required, additional land could be made available for business use within the proposed development, but this is not considered to be a high priority given the availability of jobs in the area. Newfound Farm will also have high quality bus and rail links to other key employment sites in the Norwich Policy Area, including the city centre and Wymondham. 4.5 To promote regeneration and reduce deprivation - the creation of a prosperous, sustainable and inclusive community will be in the spirit of the objective and will help to improve the overall well being of the local community through provision of high quality housing stock and a range of community services. 4.6 To allow people to develop to their full potential by providing educational facilities to support the needs of a growing population - a new primary school and pre-school facilities will be provided as part of the project. Secondary education provision will be available at Hethersett, within easy reach of the proposed development area. Public transport links are available to access education facilities in the city centre and the higher education opportunities on the University campus and at Norwich Research Park. 4.7 To make sure people have ready access to services - as well as direct public transport access to the full range of services available in the city centre, the Newfound Farm project will enhance the established services in its local area through the provision of a local centre on Round House Way. This will be brought forward at an early stage in the development. 4.8 To enhance transport provision to meet the needs of existing and future populations while reducing travel need and impact - as previously noted, the proposed residential area is within walking distance of a range of employment opportunities and key facilities. Excellence in the provision of public transport and the facilities for walking and cycling will lessen car usage. 4.9 To positively protect and enhance the individual character and culture of the area - the project will not compromise this objective. Through the application of high standards of design, the character of the new community will be established. Significant areas of public open space, recreation facilities and access to the countryside will encourage participation in community activities. 4.10 To protect, manage and enhance the natural, built and historic environment, including key landscapes, natural resources and areas of natural habitat or nature conservation value - the proposed development area has few natural features of interest, consisting of relatively recent tree belts and hedgerows of varying quality. The masterplan for the development will incorporate a landscape framework to complement that of the adjacent development and reinforce planting along the A47 corridor. In addition, a greenspace network will allow the creation of a range of habitats in an area which is currently of low ecological value and will contribute to the Green Infrastructure Priority Corridors identified in the Key Diagram. 4.11 To be a place where people feel safe in their communities - the design of Newfound Farm will give priority to walking and cycling with restricted access by private car to create a safer environment. In particular, safe routes will be developed between the residential development and the Hospital/Research Park. Key design concepts will include natural surveillance and the promotion of public safety in the design of open spaces. 4.12 To encourage the development of healthy and active lifestyles - a key component of the masterplan for the site will be a green space network providing accessible open space, and sports and recreational facilities as well as access to the Hospital/Research Park. This will complement those links included in the development brief for the extensions to the Research Park. The emphasis on walking and cycling will promote healthy travel choices. 4.13 To involve as many people as possible in new planning policy - significant new development has already taken place in the area between Colney Road and Newmarket Road and the development of the Hospital and continuing development of the Research Park has also affected the local community. In developing the masterplan for Newfound Farm, extensive consultation will be undertaken with all key stakeholders

Joint Core Strategy Proposed submission Document

S - 11696 - 8223 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11696 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

and a dialogue will be opened with the local community. AN EXPANDED COMMUNITY AT CRINGLEFORD 4.14 Policy 10 of the pre-submission document identifies Cringleford as a strategic location for major growth which should be "masterplanned as attractive, well serviced, integrated, mixed use development using a recognised design process giving local people an opportunity to shape development." The initial masterplanning process has already commenced. As the process develops, community and stakeholder involvement will be based on Enquiry by Design principles. 4.15 The general principles to be adopted in designing the major growth locations, and the response of the proposed development are set out below. 4.16 To achieve the highest possible standards of design - the proposed new houses will also achieve at least 14 out of the 20 criteria associated with the 'Building for Life' standard, run by the Commission for Architecture and the Built environment (CABE) and the Home Builders Federation (HBF). In terms of sustainable design, all dwellings should comply at least with Level 4 of the DCLG's 'Code for Sustainable Homes'. 4.17 To address current service and infrastructure deficiencies to benefit existing communities - implementation of the project should help to bring forward the provision of local centre facilities and services and contribute to the improvement of local highways infrastructure. 4.18 To deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure - distinctive design is one of the criteria associated with the 'Building for Life' standard. Emphasis is being placed on the provision of green infrastructure to provide a framework for the development and strategic green corridors linking the Newfound farm area to the Yare valley. 4.19 To provide for a wide range of housing need - the Newfound Farm area will provide a full range of house types for all stages of life, with housing for those with special needs incorporated in the mix and will contribute to the target for affordable housing. 4.20 To achieve a high level of self containment while integrating well with neighbouring communities - if a truly sustainable community is to develop in the south west sector of the city, then the project must be fully integrated with the existing development at Cringleford and with the emerging proposals for the Norwich Research Park. The promoters will work closely with the authorities and the developers of adjacent land to ensure that proper integration occurs. 4.21 To achieve a major shift away from car dependency and be designed around walking and cycling for local journeys and public transport for longer journeys - the project is based around the core bus route which the Norwich Area Transportation Study has identified in this sector of the city. It is also close to the bus rapid transit corridor on Newmarket Road. Priority in the masterplan layout will be given to walking and cycling routes. 4.22 To include Sustainable Drainage Systems (SuDS), on site or nearby renewable energy generation and water saving technologies - SuDS will be incorporated in the masterplan layout to add biodiversity value to the green infrastructure and prevent downstream flooding. In addition renewable energy generation on site is being investigated. 4.23 To include new or expanded education provision, local retail and other services, community and recreational facilities, small-scale employment opportunities and primary healthcare facilities - the project will make provision for pre-school and primary education and help to bring forward proposals for retail and healthcare facilities within a local centre. Recreation facilities will be provided as part of the green infrastructure. 4.24 To ensure high quality telecommunications and adequate energy supply and sewerage infrastructure - the project will be fully serviced to the latest standards. 4.25 With specific reference to Cringleford, Policy 10 of the pre-submission document proposes : at least 1,200 dwellings - initial studies show that at least 1400 dwellings could be provided as part of the Newfound Farm project. expansion of the existing services nearby - the project will help to bring forward proposals for local service provision. new pre-school provision and a primary school - this will be provided as part of the project. enhanced bus services to the city centre with potential for bus rapid transit also serving Wymondham, Hethersett and Norwich Research Park - the project is located on the core bus route which can provide direct links to all the stated areas. safe and direct cycle routes to the city centre, Hethel, Norwich Research Park and the Hospital - the project will be linked in to the city's cycle route network and the masterplan layout will allow for safe routes between the residential areas and the Research Park and the Hospital. green infrastructure to provide enhanced public access to the countryside and the Yare valley - the masterplan for Newfound Farm will incorporate green infrastructure to provide links to the countryside west of A47 and to the parkland of the University campus and Yare valley. 5. PRELIMINARY MASTERPLAN 5.1 Newfound Farm lies within an undeveloped area bounded to the west by the A47 Norwich southern bypass; to the south by Newmarket Road; to the east by Round House Way; and to the north by Colney Lane and the Hospital expansion land. It is shown edged red on the attached plan. 5.2 The site is currently mainly in agricultural use and extends to about 53ha. Significant residential development has recently taken place to the east of Round House Way. This includes provision for a local centre, not yet developed. 5.3 The land is solely owned by the John Innes Foundation. 5.4 South Norfolk District Council proposes that a "spatial vision plan" be prepared for land at Norwich Research Park which includes the land surrounding the Norfolk and Norwich University Hospital and extending as far as the A47 and B1108 Watton Road. It also encompasses the main university campus and Colney Hall. This area has been identified in the Core Strategy submission document as a strategic location for the expansion of health, higher education and science park activity. The development at Newfound Farm will be designed to complement the expansion of the Norwich Research Park, and other proposals for development served by Round House Way. It will be important to ensure consistency between the various proposals if a sustainable community is to develop in this sector of the city. 5.5 The masterplanning exercise for Newfound Farm is under way. The purpose of the masterplan, underpinned by a range of specialist studies, is to demonstrate the key principles to be adopted in developing the site and its capacity, taking account of known physical and policy constraints. It will also confirm how the scheme can be delivered in accordance with the requirements of the emerging Greater Norwich Joint Core Strategy. The masterplan will continue to be developed in consultation with key stakeholders and will be used to make a constructive contribution to the preparation of the Site Specific Policies and Proposals section of the South Norfolk Local Development Framework. 5.6 Taking account of constraints, already identified by the team, and assumptions relating to density and mix, a preliminary land budget demonstrates that the site is capable of providing around 1400 dwellings (at 40 dwellings/ha) together with a range of education and community facilities. Higher density development could increase the number of units to over 1700. As indicated earlier, the continuing masterplanning exercise will refine the development proposals and housing capacity. 6. CONCLUSION 6.1 This representation supports the identification of the Cringleford area as one of the locations for major growth in the Greater Norwich area. Its development would be entirely consistent with the spatial planning

Joint Core Strategy Proposed submission Document

S - 11696 - 8223 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11696 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

objectives of the Joint Core Strategy. Development of the Newfound Farm site will be critical to delivering this growth scenario. The initial findings of a masterplanning exercise has indicated that the Newfound Farm site could alone meet the proposed strategic allocation of "at least 1200 dwellings" included in the Joint Core Strategy and could accommodate additional dwellings in excess of 1200 units, if considered appropriate. This would make more efficient use of the land resource consistent with the aims and objectives of the Joint Core Strategy and national and regional planning policies.

Joint Core Strategy Proposed submission Document

S - 11708 - 8363 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - None

11708 Support

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: Taylor Wimpey Developments & Hopkins Homes Agent: Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary:

An enlargement of the existing Lodge Farm development area at Costessey would be appropriate and achievable/deliverable in the short/medium term, thereby ensuring that the momentum for the Norwich growth area is achieved expeditiously. A planned extension of the Lodge Farm site represents a key element in the early delivery of the spatial strategy for the Norwich area anticipated in the East of England Plan. The availability of land at Lodge Farm under the control of our clients represents an important factor when considering the key issue of the delivery of housing in support of Policy NR1 of the East of England Plan. Its early release would be significant building block in the implementation of the growth agenda. The strategic significance of Costessey was discussed during the course of the South Norfolk Local Plan Inquiry. When considering the NPA the inspector was of the view that the bulk of the new housing provision should be in locations on the edge of Norwich and in settlements with good communication links to the city. He indicated that he regarded Costessey as being in the highest category of housing location available with the NPA. Comments were made in the context of the Inspectors assessment of the acceptability of new housing new allocated by virtue of Policy COS2 of the SN Local Plan. The inspectors broad conclusions regarding the sustainability credentials of Costessey are equally valid in the context of the JCS and accordingly we would suggest that further housing could be provided on the north-western approach to Norwich. Accordingly we endorse the identification of Costessey in Policy 10 as a growth location. Strategic Principle 3 of the SN Local Plan recognises that a major element of growth in the NPA is to be accommodated in the SN component of the NP. In these circumstances subject to environmental and infrastructure conditions, development is accordingly to be directed to locations selected because they will minimise the need for travel, and which have good access by public transport, cycling and walking. In broad terms, Costessey exhibits the necessary locational attributes that would suggest that it is capable of accommodating further growth to respond to the content of the EEP. The SNLP acknowledges that Old Costessey and New Costessey offer a wide range of social and community facilities. Direct access to Norwich City Centre is provided along the A1074 Dereham Road whilst good access to the southern edge of the City is provided by the A47 Norwich Southern Bypass. It is noted that the settlement "is strategically very well placed as a location for new development". Furthermore when considering the Lodge Farm housing land allocation, the SNLP notes that allocation is proposed "in recognition of Costessey's status as one of the District's prime sustainable locations for new housing." We agree with para 7.1 of the Topic Paper: "Strategy to Accommodate Major Housing Growth in the NPA". Paragraph 2.1 of appendix 3 of the Topic Paper contains a similar observation. A direction of growth utilising land to the east of the A47 and south of Dereham Road will enable an urban extension to arise in the western quadrant as a direct physical extension of the existing built-up fabric of the main urban area. Para 3.2.1 of appendix 3 of the Topic Paper refers to the physical constraints evident at the edge of Norwich reinforcing the difficulty of achieving an urban extension in this area. See Para 5.2 of appendix 3 of the Topic Paper. The Topic Paper notes that the Longwater area presently contains a variety of commercial uses which provide both local employment opportunities and facilities that serve a wider catchment as a strategic employment location. We concur with the observation that the availability of employment retail, high school, medical and other facilities at Costessey is an advantage. We endorse the conclusion contained within the Topic Paper to the effect that consequently "the options for large-scale growth are focussed on extensions to Lodge Farm/Bowthorpe and at Easton." An extension to Lodge Farm can be undertaken in a manner which delivers the broad approach described at Policy 12 of the PSD. A masterplan-led approach will enable a landscape strategy to be established which will improve the western gateway to Norwich. Green infrastructure can be enhanced and public transport provision improved. However our clients are concerned at the wording of Policy 10 at page 65 of the PSD. An urban extension at Costessey may provide a financial contribution to the GNDP to assist in the creation of such a country park. We do not consider it appropriate for the JCS to propose that further growth at Costessey "will provide" enhanced public access, "including creation of" a country park. Para 2.1 of appendix 3 of the Topic Paper: Strategy to Accommodate Major Housing Growth in the NPA observes that in the southern part of the NPA there is currently limited contiguous development with Norwich, Costessey being the only built-up element of South Norfolk that is not physically separated from Norwich. Thus, the scope for urban extensions in the southern part of the NPA is limited. That being the case, the JCS should highlight the opportunity that exists to achieve a physical extension of the present built-up area of Norwich at Costessey/Lodge Farm. Given that the scope to achieve an acceptable urban extension at the edge of Norwich is limited, the PSD should be amended to highlight the role that an extension to the existing Lodge Farm development can play in achieving such a sustainable growth option. The strategic significance of an extension to the existing Lodge Farm development could be described at para 6.15 of the PSD.

Joint Core Strategy Proposed submission Document

O - 11720 - 8618 - Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area - i, ii

11720 Object

CHAPTER 6 Policy 10: Locations for major new, or expanded, communities in the Norwich Policy Area

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

Policy 10: Locations for major new or expanded communities in the Norwich Policy Area. Policy 10 sets out the locations for major new or expanded communities. The JCS is not supposed to be site specific yet without being so it cannot be shown that development is deliverable. The locations within South Norfolk - Wymondham, Hetherset, Cringleford are all dependent upon expanded capacity of the A11/A47 Thickthorn junction before development can be delivered. According to Appendix 7 - Implementation Framework, the estimated cost of the junction improvements are put at £40 million but are not programmed to be delivered until 2016. In total therefore 4,400 dwellings could be prevented from being delivered until 2016. The cost of implementing necessary improvements at the Thickthorn junction could be assisted if provision were to be made for the allocation of just over 4,000 dwellings at Thickthorn, as part of proposals already submitted to the GNDP, to help deliver the Norwich Research Park and enhanced Park and Ride/BRT facilities along the A11. The inclusion of this proposal would aid the delivery of BRT in this area and provide the necessary critical mass of development to assist the viability of the provision of necessary services in infrastructure and education etc. The advantages of the site at Thickthorn should be assessed in terms of its accessibility to the regional road network, its proximity to a major strategic employment site and its capability to help deliver housing in the short to medium term. As indicated at paragraph 6.17 there must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth. Information already compiled in respect of the detailed modelling carried out to examine capacity issues affecting the Thickthorn junction, in connection with the proposals at the Thickthorn site can help deliver a more robust assessment of the problems and possible solutions associated with a major transport intersection affecting accessibility to the wider Norwich Policy Area and could help deliver necessary development earlier than currently anticipated. Long Stratton Paragraph 6.18 states that completion of a by-pass is a pre-requisite for the scale of growth identified in Long Stratton. This appears to be a "chicken and egg" situation. If the bypass is a pre-requisite then it will have to be in place before development can occur. This raises serious questions about how such a road can be funded in advance of developer contributions which it is understood are required to pay towards the road. This appears an impossible situation and the development proposed at Long Stratton would be better re-allocated to the southwest of Norwich where communications are better and where improvements are more necessary and easier to achieve. We are critical of the contents of paragraph 6.22 where, yet again, the Proposed Submission document cannot provide the necessary evidence that all infrastructure providers are on board with the proposed development strategy and how their contributions will affect the timing of delivery. This again suggests the DPD is unsound.

Joint Core Strategy Proposed submission Document

S - 11211 - 8484 - Policy 11: Norwich City Centre - None

11211 Support

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Marks & Spencer Plc [8484]

Agent: Nathaniel Lichfield and Partners (Miss Catherine Widdowson) [8483]

Full Text: M&S supports policy 11, which confirms that the regional centre role will be enhanced, through a number of measures, including: the enhancement of the historic city, through innovative and sustainable design; and the enhancement of its retail function, specifically substantial expansion of comparison retail floorspace. M&S also supports the promotion of the St Stephens areas for mixed uses, including retail.

Summary: M&S supports policy 11, which confirms that the regional centre role will be enhanced, through a number of measures, including: the enhancement of the historic city, through innovative and sustainable design; and the enhancement of its retail function, specifically substantial expansion of comparison retail floorspace. M&S also supports the promotion of the St Stephens areas for mixed uses, including retail.

Joint Core Strategy Proposed submission Document

O - 11230 - 8537 - Policy 11: Norwich City Centre - i

11230 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Capital Shopping Centres Plc [8537]

Agent: Miss Hayley Cross [8528]

Full Text:

On behalf of our client Capital Shopping Centres plc (CSC) we are pleased to submit representations to the Submission Joint Core Strategy. CSC has a considerable interest in Norwich City Centre and has been actively involved in its development since the opening of the Chapelfield Shopping Centre in 2005. Since its opening, Chapelfield has created a new retail quarter for Norwich, attracting over 40 new retailers to the city including House of Fraser, Zara, TM Lewin, Borders and Apple Store, several of which are new to Norfolk - generating a broad mix of fashion and lifestyle retailers within a modern, contemporary shopping mall. The scheme also benefits from Chapelfield Plain, a popular external space with a selection of restaurants including Wagamama, Giraffe and Mackintosh's Canteen, offering a lively venue for lunch and evening meals. The centre has received much praise from the industry and was voted "Best New Shopping Centre" in 2006 by Property Week's Retail & Leisure Awards and more recently received a commendation from ICSC Europe. CSC supports the aim of Policy 11 which seeks to enhance Norwich City Centre as a regional centre. CSC welcomes the recognition that the City Centre will be the main focus in the sub-region for major retail, leisure and office development. CSC supports the proposed enhancement of the centre, particularly the Council's recommendation that this will be achieved through the intensification of the primary retail area and, if necessary, through its expansion. CSC is pleased that the City Centre first approach to the preferred location of new retail development is in line with national planning guidance in PPS6 and Draft PPS4. The Chapelfield Shopping Centre is located within the area designated for 'enhanced retail function / expansion of the Primary Retail Area'. CSC supports Chapelfield's inclusion within this allocation and believes that Chapelfield could potentially offer opportunities for intensification and possible expansion to contribute to achieving the anticipated level of retail growth up to 2016 and beyond. Supporting text to Policy 11 states that given the uncertainties around long term forecasting and the unpredictable impact of the 2009 recession a relatively cautious approach will be taken to comparison goods floorspace growth. The text identifies a need for around 20,000 sq m of comparison goods floorspace to 2016. It is, however, uncertain as to whether this refers to gross or net additional floorspace. CSC seeks clarification on this point within the Core Strategy. Whilst CSC agrees that the 2009 recession has cast doubt over the level and timing of economic growth, CSC believes it is imperative that changing circumstances in the aftermath of recession are proactively planned for to enable the Core Strategy to react quickly to an economic upturn. The Norwich Sub Region: Retail and Town Centres Study was published in October 2007. This study identifies potential capacity for 16,147 sq m net of new comparison goods floorspace within Norwich City Centre by 2011. This capacity forecast is set to increase to 40,001 sq m net by 2016 (and 67,918 sq m net at 2021). This represents a substantial quantum of floorspace capacity to be accommodated within the City Centre. The Core Strategy, however, only specifies capacity for "around 20,000 sq m of comparison floorspace to 2016" which is approximately half (depending of whether the Core Strategy is referring to gross or net?) the capacity identified in the 2007 retail study. A thorough critique of the 2007 retail study has not been undertaken at this time as the complete study is not available to view on the Greater Norwich Development Partnership Joint Core Strategy website. CSC request that all background evidence to the Core Strategy be made electronically available to all parties for ease of reference. Whilst supporting text to Policy 11 states that a relatively cautious approach will be taken to comparison goods floorspace growth, CSC is concerned that the 20,000 sq m figure (gross or net?) is underestimating the level of retail development required to maintain and enhance the centre's role in both the national and regional retail hierarchy. CSC accepts the recognition in supporting text that "retail need will be subject to regular monitoring and refreshed analysis to ascertain whether new floorspace is required for the later JCS [Joint Core Strategy] period". However, CSC is concerned that adopting a cautious approach in respect of the capacity identified in the 2007 study does not give the flexibility required to ensure the plan can react quickly to changing economic circumstances. The plan identifies the need for "regular monitoring and refreshed analysis", however, there is no indication of how regularly this monitoring should be undertaken. The 2007 study is now out-of-date and was prepared pre the affects of the recession. CSC believe that this study should be revised prior to the adoption of the Core Strategy to reassess quantitative need for new retail development in the city centre for the plan period (up to 2026 - not to 2021 as predicted up to in the 2007 study) as set out in PPS6 (para. 2.32) and Draft PPS4 (para. EC1.4 and EC5.1). The findings of the 2007 study can not be relied upon for the formulation of supporting text to policy as this is not consistent with PPS12 guidance.

Summary:

CSC supports the aim of Policy 11. CSC supports the proposed enhancement of the centre, particularly the recommendation that this will be achieved through the intensification of the primary retail area and, if necessary, through its expansion. However, the 2007 retail study is out-of-date and should be revised in order to reassess the quantitative need for new retail development in the City Centre up to 2026, as set out in PPS6 and draft PPS4. The findings of the 2007 study can not be relied upon for the formulation of supporting text to policy/policy as this is not consistent with PPS12.

Joint Core Strategy Proposed submission Document

O - 11375 - 8627 - Policy 11: Norwich City Centre - i, ii

11375 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: The policy is too general and provides no indication of when the development will be delivered and by whom and when. Objection 2: There are no output/outcome driven targets. Policy 11 is too general, particularly with respect to which specific areas of the City Centre will be regenerated, when and by what means this will be achieved. In its current form, there are no clear output/outcome driven targets. As discussed earlier, the Inspector in the PreRJCS highlighted the need to demonstrate at submission that all infrastructure providers agree that there is a reasonable prospect that crucial components of infrastructure can be provided at the appropriate time. Our concern is that it is not made clear how the 3000 dwellings relied on in the City will be supported by infrastructure. 3.15 In line with this, we would recommend that a more detailed policy is worded that identifies the specific areas of Norwich City that will be enhanced or expanded and identify the necessary actions and responsibilities in order to achieve this. As identified under our comments on Policy 20, there is a need for a detailed Delivery Plan which identifies when and who will deliver infrastructure.

Joint Core Strategy Proposed submission Document

O - 11427 - 905 - Policy 11: Norwich City Centre - iii

11427 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] **Agent:** N/A

Full Text:

Summary: Policy 11 norwich city centre, p70The historic character of Norwich is derived from a longer time period than is represented in its medieval heritage, with examples from earlier and later periods. We suggest that the policy should be less narrow and should refer to the distinctive historic character identified in Conservatuion Area Appraisals anmd archaeological records.

Joint Core Strategy Proposed submission Document

O - 11428 - 905 - Policy 11: Norwich City Centre - iii

11428 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] Agent: N/A

Full Text:

Summary: references for policy 11, p72

Joint Core Strategy Proposed submission Document

O - 11576 - 8018 - Policy 11: Norwich City Centre - i, ii

11576 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: 4d In Policy 11 the envisaged expansion of retail floorspace in the city centre and its continued promotion as a prime shopping location could affect the viability of other centres, particularly those associated with new development to the north-east. 4e The green links specified for the inner urban area on page 73 go through many densely developed areas - this would significantly question the deliverability of the proposed green links.

Joint Core Strategy Proposed submission Document

O - 11579 - 8018 - Policy 11: Norwich City Centre - ii

11579 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: 6. There is little detail about how growth will be tailored to tackle deprivation:6a 3.8 specifically mentions 'extensive areas of multiple deprivation in Norwich' yet there is little in the strategy to suggest specific ways of shaping growth to directly benefit deprived urban areas. This could be in the form of improved transport links specifically between deprived residential areas and employment areas or targeted training initiatives to support new industries.6b The strategy needs to contain more commitment on creating new jobs in sustainable industries such as renewable energy, energy efficiency in homes, repair and waste recovery, organic farming, public transport etc We also have concerns that housing could in practice become the major stimulus for growth meaning that many of the jobs created could be at the less-skilled end of the market.

Joint Core Strategy Proposed submission Document

O - 11591 - 7653 - Policy 11: Norwich City Centre - ii

11591 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary: The Safer Neighbourhood Team area of Norwich City centre has the highest level of crime in Norfolk. The level of crime in the Norwich city centre may have an adverse impact on the Policy objective to focus on promoting retail, leisure, office, cultural and residential development. The policy should also state "the main focus of City Centre development should be to make Norwich a safe place to develop retail, leisure, office, cultural and residential development".

Joint Core Strategy Proposed submission Document

O - 11616 - 8127 - Policy 11: Norwich City Centre - i

11616 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Swannington with Alderford & Little Witchingham Parish Council (Mr Steve Griggs) [8127] **Agent:** N/A

Full Text:

Summary: In addition, we are not convinced that there will be a requirement for the scale of expansion envisaged for retail outlets. It is obvious that large scale development of retail in one part of the city (Chapelfield for example) results in decline in other areas (units vacant in Castle Mall and shops closing or moving to Chappelfield). The possible consequences of any decision to expand late night leisure area should be carefully thought through, to avoid adding to the already not inconsiderable problems of policing and controlling the large number of youngsters who come in to Norwich for its Nightlife. Again this is a "chicken and egg" situation. Are we providing the nightlife facilities because there is a demand for them, or is the "demand" fuelled by the fact that the facilities are there? What evidence is there that Norwich benefits from this?

Joint Core Strategy Proposed submission Document

S - 11629 - 7523 - Policy 11: Norwich City Centre - None

11629 Support

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development. Although there is an aim to maximise development on brownfield land, there is no specific target.

Joint Core Strategy Proposed submission Document

S - 11659 - 8366 - Policy 11: Norwich City Centre - None

11659 Support

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. In our previous representations to the Regulation 25 consultation, the BLT suggested that a reference to the importance, success and possible expansion of park and ride facilities in reducing congestion in the city centre should be mentioned in this policy. Although the BLT do not believe that this impacts on the soundness of the plan, it is considered that it would be helpful to reference in this policy. As no responses have been given by the GNDD to the previous representations submitted, the BLT are not aware as to why this suggested change has not been included.

Joint Core Strategy Proposed submission Document

S - 11678 - 8270 - Policy 11: Norwich City Centre - None

11678 Support

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Henderson Retail Warehouse Fund [8270]

Agent: Savills(Manchester) (The Manager) [8269]

Full Text:

Summary: We support the GNDP in its recognition that the role of Norwich City Centre (which includes Riverside Retail Park) will be promoted through enhancements to its retail function. This accords with Objective 3.

Joint Core Strategy Proposed submission Document

O - 11680 - 8270 - Policy 11: Norwich City Centre - None

11680 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Henderson Retail Warehouse Fund [8270]

Agent: Savills(Manchester) (The Manager) [8269]

Full Text:

Summary: Norwich City Centre Key Diagram (p73)We note that Riverside Retail Park is identified on the Diagram as follows:1. Areas of Change. Mixed use development sites with improved public realm;2. Other shopping areas; and3. Main focus of change - commercial.To reflect our request set out above in relation to Policy 19 and our enclosed letters, we also request for the designation to be amended to 'Primary Retail Area' (or such named equivalents).

Joint Core Strategy Proposed submission Document

O - 11687 - 8352 - Policy 11: Norwich City Centre - iii

11687 Object

CHAPTER 6 Policy 11: Norwich City Centre

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] **Agent:** N/A

Full Text:

Summary: Refers to Paragraph 6.29 We support the view that flood risk will need to be considered further in relation to site specific DPDs. However, we note that the Norwich City Centre key diagram (pg73) appears to allocate broad 'areas of change' some of which are shown by the Environment Agency Flood Zone maps and the Norwich City Council Strategic Flood Risk Assessment (SFRA) to be at a degree of Flood Risk. Policy 11 and the associated supporting text does not appear to refer to this diagram. It is therefore unclear what the status of this diagram is, how these areas have been allocated and the constraints taken into consideration when allocating. It should be acknowledged that broad areas for redevelopment need to be assigned in line with the requirements of PPS 25 and the need to apply the Sequential Test across the whole of the Norwich City area.

Joint Core Strategy Proposed submission Document

O - 11163 - 8465 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i, ii

11163 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Mr Trevor Lewis [8465]

Agent: N/A

Full Text:

I believe that the Joint Core Strategy is unsound because the JCS does not identify the scale of future development that might result in Trowse, and so Trowse cannot form a meaningful judgement on what is proposed. Most other locations in the JCS area will know from the JCS the level of proposed development to be expected. All that Trowse knows is that it will be expected to contribute towards the 1800 South Norfolk non-place-specific allocation. If indeed the policy means what it says, and that development will be restricted to redevelopment, then I think that Trowse would be content with that. If however the vagueness of the policy results in the rezoning of agricultural land for residential development, Trowse would want more details at this stage. When at a meeting of South Norfolk Cabinet I intervened as District Councillor to make this very point, and asked what the figure for Trowse might be, I recall that the answer was (somewhat flippantly) stated by an officer to be potentially anything up to 1,000 houses, depending on future studies. While I am sure that this upper figure could never be possible, a development of several hundreds of houses could physically be accommodated. If therefore there is a possibility that the population of Trowse could double in the foreseeable future, Trowse needs to be told. The planning issues related to expansion other than by regeneration are not very complicated. There is identifiable agricultural land under single ownership within the village which the owner wishes to go for housing development. That would be contrary to current policies. The new policy must set off river valley protection (in particular) against the need for further housing. That is something that the JCS should be clear on now, so that (if housing is to prevail) this will be a clear matter for later public examination. I appreciate that it not the intention of the JCS to be site-specific, but in the case of Trowse it is difficult to be otherwise. Part of the problem may be the misidentification of Trowse as 'urban fringe'. The JCS classifies Trowse under policy 12, as 'remainder of the Norwich area, including fringe parishes'. I believe that Trowse is not suitable for the criteria and objectives for the settlements covered by policy 12. The document states that the existing Norwich urban area includes the built-up parts of the urban fringe parishes, including Trowse. The relevant opportunities are stated to be: 'To identify and regenerate tired suburbs and promote neighbourhood based renewal': Trowse is not tired, nor is it generally in need of renewal 'To improve the townscape and retain the best of local character': Trowse needs little improvement (and 'townscape' is not really an appropriate term for a village), as this objective is already met by its conservation area status. 'To improve the gateways to Norwich on major routes from the urban edge': Trowse is not on a major route to central Norwich, being cut off by its bypass and protected from through traffic by a morning-peak bus gate on its only through road 'Small- and medium-scale redevelopments to increase densities, where improved townscape will result, particularly around district centres and on public transport routes': there is indeed such a regeneration opportunity, on the May, Gurney site, but that is already identified for this possibility in existing plans, and it would not be inconsistent with the exceptions criteria for a service village in policy 15. Most of the remainder of the policy are either not relevant to Trowse, or are already present, or would happen regardless of designation. Trowse is inherently different from the other villages designated 'urban fringe'. It is a true village that just happens to be only 2km from central Norwich, but is physically separated from it by a hard edge of Norwich at the rivers and railway. In comparison, Costessey, Thorpe St Andrew, Sprowston, Old Catton and Hellesdon are urban extensions of Norwich that a visitor would not appreciate to be other than part of Norwich 'Cringleford, Drayton and Taverham have more separation, but are much larger and already include substantial suburban development. Colney is a special case, being residentially very small but a major Norwich-facing employment area. Trowse fits the criteria for a service village, with its primary school, food shop, bus connections and village hall, as described in policy 15. I believe it should be classified under that policy.

Summary:

The possible scale of housing development in Trowse is not clear, which prevents the public from forming a judgement on the JCS. The JCS is arguable unsound in classifying Trowse as 'urban fringe'.

Joint Core Strategy Proposed submission Document

O - 11166 - 6956 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - iii

11166 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Norfolk Homes Ltd (Mr Terence Harper) [6956]

Agent: Allan Moss Associates Ltd (Mr Allan Moss) [8473]

Full Text:

Policy 12 makes reference to * "the protection of the landscape setting of the urban area". If the intention is to maintain existing local landscape designations or create new ones then such an approach would be unsound as it would be contrary to national planning policy as set out in paragraphs 24 and 25 of PPS7 and Policy ENV2 of the East of England Regional Spatial Strategy. Paragraph 24 of PPS7 indicates states: "The Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally. The Government believes that carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, carefully drafted, criteria-based policies in LDDs, utilising tools such as landscape character assessment, should provide sufficient protection for these areas, without the need for rigid local designations that may unduly restrict acceptable, sustainable development and the economic activity that underpins the vitality of rural areas." Paragraph 25 of PPS7 indicates: "Local landscape designations should only be maintained or, exceptionally, extended where it can be clearly shown that criteria-based planning policies cannot provide the necessary protection. LDDs should state what it is that requires extra protection, and why. When reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on a formal and robust assessment of the qualities of the landscape concerned." Policy ENV2 of the East of England Plan is also consistent with PPS7 in advocating the use of criteria-based policies, informed by the area-wide strategies and landscape character assessments, to ensure all development respects and enhances local landscape character. Policy 12 should make it clear that there is no intention to maintain existing local landscape designations or create new ones. It should indicate that landscape protection will be achieved through the use of criteria-based policies informed by landscape character assessments in accordance with the requirements of PPS7.

Summary:

Policy 12 makes reference to * "the protection of the landscape setting of the urban area". If the intention is to maintain existing local landscape designations or create new ones then such an approach would be contrary to national planning policy as set out in paragraphs 24 and 25 of PPS7. Policy 12 should make it clear that there is no intention to maintain existing local landscape designations or create new ones. It should indicate that landscape protection will be achieved through the use of criteria-based policies informed by landscape character assessments in accordance with the requirements of PPS7.

Joint Core Strategy Proposed submission Document

O - 11172 - 8486 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i, ii, iii

11172 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Kerry Walker [8486]

Agent: N/A

Full Text:

We have recently moved into Trowse (August 2009) and were not informed of this potential development. We have a strong objection to this for a number of reasons:- We are concerned regarding the impact more housing above us (we would be at the bottom of the hill) would have upon increasing flood risk. We already live near areas of potential flooding and consider increased housing to only increase the risk of future flooding. - The negative impact a large building project would have on my family and I. We have a two year old girl who loves the countryside we have here. There is no pathing between the Paddock and the village. This is bad enough without workers/haulage vehicles travelling on a daily basis and then the increase in car numbers any new development would bring. This is not only hugely inconvenient but also dangerous and not acceptable. Our house is below road level so noise pollution would be awful. - Trowse does not have amenities to cope with a large increase in population. It has been relatively stable for a long period of time. This is part of its attraction and charm. It is a reason we moved here. It maintains a 'village' feel due to a lack of big supermarkets or such concerns. An increasing population will inevitably bring the big companies in ruining the charm of villages such as Trowse. - White Horse Lane could not cope with the increased load resulting from the increasing population. It barely copes now. Vehicles regularly break the 30/20mph restriction in an area containing a school and young families, including my own. Vehicles often have to wait to pass each other, due to the necessary parking outside Jubilee Terrace, the road could not be widened because of the existing housing and the Common. - I am unsure if Trowse School could cope with extra burden resulting from increased population.

Summary:

Summary of main issues:- Increased housing would increase flooding risk, especially surrounding the area we live (The Paddock)- Negative impact of building workers/haulage upon countryside and my families safety especially in view of lack of paving. (We have to walk on the road). Noise pollution would be unacceptable. - Trowse does not have amenities to cope with increased population.- White Horse Lane can not cope with increased traffic. Vehicles already break speed limits.- Excessive pressure placed on Trowse School.

Joint Core Strategy Proposed submission Document

O - 11197 - 6883 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i

11197 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Dr Jeremy Bartlett [6883]

Agent: N/A

Full Text: "Construction of the Northern Distributor Road (NDR) will reduce the impact of traffic on residential areas and allow significant enhancement of public transport, cycling and walking..."As previously stated, this is not true. Any improvement will be short term and longer term the NDR will increase traffic. Spending money on the NDR will mean less is available for other projects, such as public transport, cycling and walking. I am very disappointed that Norfolk County Council's long standing support of the NDR, which flies in the face of experiences elsewhere (e.g. Newbury) has dominated this report to such an extent.

Summary: "Construction of the Northern Distributor Road (NDR) will reduce the impact of traffic on residential areas and allow significant enhancement of public transport, cycling and walking..."As previously stated, this is not true. Any improvement will be short term and longer term the NDR will increase traffic. Spending money on the NDR will mean less is available for other projects, such as public transport, cycling and walking. I am very disappointed that Norfolk County Council's long standing support of the NDR, which flies in the face of experiences elsewhere (e.g. Newbury) has dominated this report to such an extent.

Joint Core Strategy Proposed submission Document

S - 11228 - 8542 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11228 Support

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: Support the intention to improve gateways by seeking environmental and townscape improvements. Land at Harford Bridge can deliver a new riverside park/walks, opening up access to the valley of the River Yare.

Summary: Support the intention to improve gateways by seeking environmental and townscape improvements. Land at Harford Bridge can deliver a new riverside park/walks, opening up access to the valley of the River Yare.

Joint Core Strategy Proposed submission Document

O - 11229 - 8542 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i, ii, iii

11229 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Mr & Mrs D E Smith [8542]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: In relation to Policy 9 we argue that an additional strategic allocation should be made at Harford Bridge. As a consequence, an additional bullet should be added explaining that the site is identified as a general employment area. Use classes B1/B2/B8 should be allowed for along with Sui generis uses which share the characteristics of such uses. The policy should also reflect the intention to provide access to the River Yare and the opportunity to enhance the A140 gateway to Norwich.

Summary: In relation to Policy 9 we argue that an additional strategic allocation should be made at Harford Bridge. As a consequence, an additional bullet should be added explaining that the site is identified as a general employment area. Use classes B1/B2/B8 should be allowed for along with Sui generis uses which share the characteristics of such uses. The policy should also reflect the intention to provide access to the River Yare and the opportunity to enhance the A140 gateway to Norwich.

Joint Core Strategy Proposed submission Document

O - 11315 - 8567 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11315 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Trowse with Newton Parish Council (Mr Jason Middleton) [8567] **Agent:** N/A

Full Text:

Summary: Trowse is a model village, expanded by the Colman family in the 1800s and maintains this historical character and spatial layout, as a small village. Despite being located close to the centre of Norwich, Trowse still is and feels like a rural village and is separated from Norwich by water meadows, two rivers and a railway line. Therefore, it is not suburb of Norwich, not can it be regarded as being urban. For this reason, it is extremely important that any future development, in or around Trowse, respects it's village status and does not undermine the nature or quality of the existing settlement. Within the JCS, Trowse has been defined under Policy 12, as being part of the Norwich urban area, including fringe parishes. However, when examining the JCS in detail, the nature and location of Trowse makes it more suited to being covered under Policy 15 as a service village as there are a number of services which Trowse provide which are used by neighbouring villages, including the local shop and the primary school. The council is not against future development, and understands that limited development will be required within the parish, however, the nature and scale of any development needs to be carefully considered against local needs and the local context, which is reflected in Policy 15, but not in Policy 12.

Joint Core Strategy Proposed submission Document

O - 11376 - 8627 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i, ii

11376 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: The policy is too general and provides no indication of when the development will be delivered and by whom and when. Objection 2: There are no output/outcome driven targets. Again, a greater degree of detail is required on how regeneration will be delivered in the Norwich urban area and the fringe parishes. Individual projects and proposals in these areas should be identified and an indication provided of how/when each one is expected to come forward. A new policy should be created that includes reference to a detailed Delivery Plan which identifies the key target improvements to infrastructure and when and who will deliver them. In many instances with respect to small and medium scale developments, the private sector may be able to undertake improvements to the existing infrastructure. However, for larger scale, strategic site releases, public sector investment will be necessary, such as in the case of the NDR, which is considered to be a "critical" piece of infrastructure to the growth of the Norwich urban and suburban area. The Delivery Plan must be clear about whether agreement has been secured from third-party infrastructure providers, which is unclear from the JCSPS.

Joint Core Strategy Proposed submission Document

O - 11388 - 3868 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i

11388 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: University of East Anglia (Mr Roger Bond) [3868] Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text:

Summary: SummaryThe University of East Anglia (UEA) considers Policy 12 to be unsound because it fails the Justified soundness test. However, the UEA considers that the failure is not fundamental to the general intent of the policy and can be put right with non-substantive wording and graphical changes, to include specific reference to improvement to public transport including a Bus Rapid Transport (BRT) linking through the Norwich Research Park. Main RepresentationWhilst the UEA supports JCS Policy 12 intentions for the implementation of a bus rapid transit network on selected routes linking the City centre and railway station to the strategic employment and growth locations., it is concerned however that major employment locations with important existing public transport interchanges at the University, the Norwich Research Park and the hospital, have been omitted from the Bus Rapid Transport routes shown on the Norwich Area Transportation Study - Proposed implementation Plan notwithstanding the fact that Appendix 8 lists the need for a bus priority route between the City Centre and this area. The UEA considers that to not include the UEA on a complete BRT route, linking the UEA and the rest of the NRP with the City Centre and new strategic growth locations in the South West Sector is a missed opportunity to create a high quality public transport link to between important public transport interchanges, with the potential to avoid heavily trafficked routes that currently blight exiting bus travel. It therefore is not the most appropriate strategy when considered against the reasonable alternatives and fails the Justified soundness test. The UEA notes that elsewhere in the JCS (Appendix 7 - Implementation Framework), mention is made of a bus priority route via Hethersett Lan/Hospital/NRP/UEA/City Centre. This link needs to be properly reflected as a BRT. Suggested changePolicy 12 and the NATS Implementation Plan on page 61 need to be changed to include a more specific reference to the UEA as being part of a key public transport route (BRT), linking Wymondham/Hethersett through the NRP and into Norwich.

Joint Core Strategy Proposed submission Document

O - 11407 - 7172 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11407 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary:

Sustainability Appraisal Not compliant. Although the SA highlights that major growth located close to a NDR could result in environmental impacts such as car-based trips, the SA does not consider alternative transport options which would avoid or reduce adverse impacts as required by the SEA Directive. The SA has treated the unsustainable NDR as part of the baseline case and not as an option. Responding to public criticism on this traffic-generating impact of the NDR, the SA Report asserts: "The NDR may encourage car-based trips", but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of the road by residents of the Growth Area. However, the NDR Major Scheme Business Case (July 2008) shows high traffic growth on a number of road links across the Norwich Area as a result of the NDR Preferred Option, with substantial growth on radial roads in north-east Norwich and an increase in carbon dioxide emissions compared to Do-Minimum. Norfolk County Council has programmed construction of the NDR in 2014-15, whilst sustainable transport measures, including a bus rapid transit system, are not programmed for completion until 2025. There is a strong danger that people will get into the habit of using their cars if a NDR goes ahead. Local experience has shown the difficulty of transferring orbital car-based journeys to sustainable modes.

Joint Core Strategy Proposed submission Document

O - 11420 - 7172 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11420 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary:

Not legally compliant with RSS Norwich Policy NR1 which seeks to: 'achieve a major shift in emphasis across the Norwich Policy Area towards travel by public transport, cycling and walking.' Policy NR1 must also be read alongside wider RSS policies to reduce the region's impact on climate change by locating development so as to reduce the need to travel and effect a major shift in travel away from car use towards public transport, walking and cycling. The GNDP claims that a NDR is in conformity with the RSS because RSS Policy Norwich NR1 refers to 'having regard to the Norwich Area Transportation Study (NATS), which provides a strategy for improving access by all modes of transport across the Norwich Policy Area' and NDR is a key element of NATS. At the time of the RSS EiP in 2005, the NDR project in the Draft East of England Plan was a full orbital route to the north of Norwich, approved as part of NATS in 2005. Norfolk County Council dropped the western section over the River Wensum SSSI/SAC shortly before the EiP and the NDR became a three-quarters road. Depending on the outcome of the Minister's decision on Programme Entry, the NDR could be further reduced in length. The Eastern Daily Press on 11 December 2009 reported that DfT civil servants are recommending Programme Entry for a NDR between A47 Postwick Interchange and A140, but not west of the A140. If accepted, a half route NDR would largely function as a development road for north-east Norwich and not as a full or three-quarters distributor road for north Norwich. Also, the NATS would no longer be predicated on a NDR. In such circumstances, a NDR would not be in conformity with the RSS Policy NR1 as the purpose of the NDR/NATS approved by Norfolk County Council in 2005 would have changed considerably.

Joint Core Strategy Proposed submission Document

O - 11536 - 8271 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - ii

11536 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Goymour Properties Ltd. [8271]

Agent: Andrew Martin Associates (Mr Michael Calder) [8498]

Full Text:

Summary: Reasoned Justification: Whilst the principle of Policy 12 is supported, we have concerns about the 'soundness' of the policy. Planning Policy Statement 12 (PPS12) sets out that the examination of any Development Plan Document is concerned with matters of legal compliance and soundness. To be 'sound' a CS should be: * justified; * effective; and * consistent with national policy. To be "effective" the CS must be: (i) deliverable; (ii) flexible; and (iii) able to be monitored. It is submitted that the Spatial Vision is not "sound" as it is not "effective". The policy is not "effective" for reasoning as follows: The fourth bullet point of the policy identifies that within the fringe parishes opportunities will be sought, amongst others, for 'small-scale and medium-scale redevelopments to increase densities where a design and access statement demonstrates that an improvement to townscape will result and particularly around district centres and on public transport routes'. The text is in our view is not flexible and is restrictive as written and does not recognise that greenfield development in appropriate locations will also improve townscape and will be around district centres and on public transport routes. We therefore consider that the reference to 'redevelopment' is unnecessary restrictive and does not provide for a flexible approach. Therefore for Policy 12 to be "effective" we consider that the text in the fourth bullet point should be amended to refer to 'development' opposed to 'redevelopment' in recognition of the ability of appropriate greenfield growth within the built up areas of the fringe parishes to contribute towards townscape and sustainable travel patterns.

Joint Core Strategy Proposed submission Document

S - 11539 - 8599 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11539 Support

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Mr Charles Birch (Trustees of the Gurloque Settlement) [8599]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

Our clients acknowledge and concur with the observation at Policy 12 that the 'existing Norwich urban area' incorporates the built-up parts of the urban fringe parishes, including Drayton and Taverham. We agree with paragraph 6.30 of the PSD which states that the existing suburbs and immediate urban/rural fringe 'are key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the links between the city centre and surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated approach in this strategy.' We agree with that element of Policy 12 which requires that, throughout the suburban area and fringe parishes, opportunities will be sought: o To improve townscape and retain the best of local character o To improve the gateways to Norwich by seeking co-ordinated environmental and townscape improvement o To retain and improve local services o To enhance green infrastructure and links between currently fragmented habitats and to the rural fringe o The protection/enhancement of the landscape setting of the existing Norwich urban area o The establishment of a comprehensive cycle and walking network o Implementation of a bus rapid transport network on selected routes linking the city centre to the main growth locations Within this broad policy framework, we consider that a medium-scale development at Thorpe Marriott can address many of the objectives contained in Policy 12. A medium-scale development opportunity can arise at Thorpe Marriott within the context provided by Policy 9 of the PSD which establishes the strategy for growth in the NPA. Policy 9 states that the NPA is the focus for major growth/development and housing requirements will be addressed by the identification of new allocation to deliver a minimum of 21,000 dwellings 'distributed across the following location'. One of the policy approaches is deemed to be 'Broadland smaller sites in the NPA: 2,000 dwellings.' We would observe that Policy 9 states that 'allocations to deliver the smaller sites in Broadland and South Norfolk will be made in accordance with the settlement hierarchy and local environmental and servicing considerations.' Policy 12 of the PSD plainly defines Drayton/Taverham as part of the existing Norwich urban area. The primary urban area is the focus for major growth and development in the JCS. Consequently, there would be merit, in terms of the wider spatial strategy for the NPA, in directing some development to Thorpe Marriott to address the requirement to provide 2,000 dwellings in Broadland on sites smaller than those described in Policy 10 of the PSD. Policy 12 of the PSD refers to the implementation of a bus rapid transit network on selected routes. We have noted that the plan at page 61 of the PSD describes a 'Bus Rapid Transit Corridor with Bus Priority Measures' along the A1067. Equally the Norwich Area Transportation Strategy proposed implementation plan also identifies National Cycle Network Route 1 linking Thorpe Marriott with the city centre. These elements form components of Policy 12 of the PSD and underpin the role that Thorpe Marriott can play in accommodating some of the 2,000 dwellings arising on smaller sites at Policy 9 of the PSD. The Trustees welcome the Strategy for the NPA which aims to deliver the planned housing growth via large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area. This approach acknowledges the possibility of utilising planned urban extension of a moderate scale, interlinked with an existing neighbourhood of Norwich to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich. The achievement of the necessary housing delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocation which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. Not only is it important to ensure that new housing is supported by essential community facilities/infrastructure but it is also equally vital to confirm that the proposed urban extensions are integrated with existing built-up area of Norwich. The new development areas must exhibit a strong degree of interaction with the existing urban area if the objectives enshrined in Policy NR1 of the East of England Plan are to be fulfilled. Given the general intention of the Joint Core Strategy to seek a closer relationship between new housing, jobs and services, we would propose that new housing at Thorpe Marriott would be well placed to support the increase in the employment opportunities envisaged at the Airport. The physical relationship between the two areas will be significantly enhanced by the construction of the Norwich Northern Distributor Road. The JCS seeks to enhance the areas transportation system, Such improvement will be achieved by promoting the Norwich Northern Distributor Road to aid strategic access, significantly improve quality of life, environmental conditions, and provide capacity for public transport improvements. The NNDR is viewed in the JCS as a strategic element of the Norwich Area Transportation Strategy providing transport infrastructure to unlock growth and improving surface access to Norwich Airport. The proposed alignment of the NNDR passes close to the edge of Taverham/Thorpe Marriott and will fundamentally change the accessibility of this urban fringe parish. The NNDR, in certain locations, has the strategic ability to link new housing and employment areas. This is the case in the context of the enhanced linkages that would arise between Thorpe Marriott and Norwich Airport. An enlargement of Thorpe Marriott would be appropriate and achievable/deliverable in the short/medium term, thereby ensuring that the momentum for the Norwich growth area is achieved expeditiously. A planned extension of Thorpe Marriott, adjoining the proposed NNDR, could represent a key element in the early delivery of the spatial strategy for the Norwich area anticipated in the East of England Plan. The availability of land in this strategic location represents an important factor when considering the key issue of the delivery of housing in support of Policy NR1 of the East of England Plan. Its early release would be a significant

Joint Core Strategy Proposed submission Document

S - 11539 - 8599 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11539 Support

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

building block in the early implementation of the growth agenda. The growth at Thorpe Marriott would draw upon the 'Broadland smaller sites in the NPA' allowance of 23,000 dwellings. Thorpe Marriott is well related to the Airport at the present time and that physical relationship will be enhanced with the construction of the NNDR. Given this strategic overview/relationship, our clients would contend that an expansion of Thorpe Marriott should play an important role in the short/medium term, providing new housing in close proximity to the strategic employment location at Norwich Airport to which the settlement will be more directly linked by the NNDR. We would observe that Thorpe Marriott is already well related to the Airport and the built-up area of Norwich via Reepham Road and Fakenham Road/Drayton High Road. The value of the A1067 in terms of public transport is shown on the plan at page 61 of the PSD that identifies the proposed implementation plan for NATS. Given this context, we would propose that Thorpe Marriott is an appropriate urban fringe parish (Policy 12) to accommodate part of the Broadland smaller sites allowance of 2,000 dwelling (policy 9).

Joint Core Strategy Proposed submission Document

O - 11580 - 8018 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - ii

11580 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: 6. There is little detail about how growth will be tailored to tackle deprivation:6a 3.8 specifically mentions 'extensive areas of multiple deprivation in Norwich' yet there is little in the strategy to suggest specific ways of shaping growth to directly benefit deprived urban areas. This could be in the form of improved transport links specifically between deprived residential areas and employment areas or targeted training initiatives to support new industries.6b The strategy needs to contain more commitment on creating new jobs in sustainable industries such as renewable energy, energy efficiency in homes, repair and waste recovery, organic farming, public transport etc We also have concerns that housing could in practice become the major stimulus for growth meaning that many of the jobs created could be at the less-skilled end of the market.

Joint Core Strategy Proposed submission Document

S - 11630 - 7523 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11630 Support

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development. Regional policy supports proposals for the Norwich Northern Distributor Road (NNDR). The East of England Plan Panel Report (published in June 2006) stated that development of the NNDR is 'essential to improve the quality of life in residential areas, aid rural regeneration ... and facilitate urban expansion'. Urban growth policies of the JCS are consistent with this approach. Development of the NNDR is currently scheduled for pre 2013/14. Improvements to the A11 and A47 are under consideration. Provision of a bypass on the A140 at Long Stratton is not currently included in regional transport objectives.

Joint Core Strategy Proposed submission Document

O - 11660 - 8366 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i, ii

11660 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations. We support the addition of the first paragraph, which states that the existing Norwich urban area will be expanded through significant growth in the Old Catton, Spowston, Rackheath, Thorpe St Andrew growth triangle. The BLT are broadly supportive of the policy. However, representations made to the regulation 25 consultation, the BLT suggested a number of amendments to the policy, which have not been taken into account. As no responses have been given by the GNDP to these previous representations, the BLT are not aware as to why their suggested changes have not been included. Set out below are the amendments that the BLT consider need to be made together with an indication of where this impacts on the soundness of the plan.

1. Recognition in the policy that although areas of landscape /ecological interest will be retained and enhanced, there will be a fundamental shift in the character of areas of growth - It is considered that if the policy is interpreted and applied in a way which results in the blanket protection of all green infrastructure, this will significantly limit the opportunity for growth and therefore threaten the deliverability and flexibility of the plan. As such, the policy has the potential to make the plan ineffective and therefore, unsound.
2. Reference to the opportunity for an inner link road to be developed in north east Norwich - The omission to include this reference in the transport improvements mentioned in this policy has the potential to cause the growth strategy to be ineffective and therefore unsound. In addition, the GNDP have not justified why this would be an inappropriate strategy and as such the omission of this reference is unjustified.
3. Reference to the opportunity to utilise the underused Bittern Railway Line - Although it is recognised that the policy states that improvements will be made to infrastructure on other key routes of the public transport network, responses have not been given by the GNDP to the previous representations submitted, the BLT are not aware as to why this suggested change has not been included. However, it is not considered that this omission would necessarily make the Core Strategy unsound.
4. Reflect the aspiration to expand the knowledge economy in the Norwich Policy Area - Again, whilst it is considered that this would not make the Core Strategy unsound, the GNDP have not given responses to the BLT's previous submissions and therefore, it is not known why this has not been included.
5. The policy recognises the opportunity to 'identify and regenerate tired suburbs' - It is considered that this proposition doesn't go far enough. and we suggest that the stimulus of new growth should be utilised to re-engineer the walkability of the established suburbs that are adjacent to the proposed growth areas and that the siting of new neighbourhood facilities should be informed by how these contribute to the amenity and walkability of the established urban fringe.

Joint Core Strategy Proposed submission Document

S - 11668 - 8511 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11668 Support

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary: We support the observations and proposals outlined in paragraph 6.41.

Joint Core Strategy Proposed submission Document

S - 11688 - 8352 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - None

11688 Support

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary:

Due to the non-site specific nature of this policy, we do not feel that it should be subject to an unsound representation on the issue of flood risk. However, it should be acknowledged that the Norwich area, especially within the city centre, is subject to a large extent of flood risk. In consideration of the numbers, distribution and vulnerability type of the development proposed, the requirements of PPS 25 should be adhered to. In particular, any proposed local development document will need to be supported by evidence that the PPS 25 Sequential Test has been applied. Any sites coming forward ahead of or in addition to plan allocations will need to pass the Sequential Test at application stage. *Please note that should the inspector deem it necessary for us to attend the Examination in Public, we would be happy to do so, but our preferred method of liaison at this time and regarding this issue would be by written representations.

Joint Core Strategy Proposed submission Document

O - 11721 - 8618 - Policy 12: The remainder of the Norwich urban area, including the fringe parishes - i, ii

11721 Object

CHAPTER 6 Policy 12: The remainder of the Norwich urban area, including the fringe parishes

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary: This policy makes reference to a "smaller urban extension at Cringleford" which contradicts the statement appearing at paragraph 6.15 of the proposed Submission Document stating that urban extensions to the south of Norwich are inappropriate.

Joint Core Strategy Proposed submission Document

S - 11217 - 6956 - Policy 13: Main Towns - None

11217 Support

CHAPTER 6 Policy 13: Main Towns

Respondent: Norfolk Homes Ltd (Mr Terence Harper) [6956]

Agent: Wheatman Planning Ltd (Mr Simon Wheatman) [8417]

Full Text:

Welcome the inclusion of Aylsham for minimum allocation of 300 dwellings given the excellent range of services and facilities in the town, plus the availability of employment land. Notwithstanding the issues concerning the overall spare capacity and further potential for expansion at the waste water treatment works (that are understood to be still pending further studies currently), our clients' site (BDC0018) is considered by Anglian Water to be ideally located so as not to be affected by capacity problems within the sewer network within other parts of the town. Subject to resolution of the capacity of the waste water treatment works, the Norfolk Homes site could be available for development earlier than 2014/15 as implied in Appendix 6 relating to the housing trajectory.

Summary:

Support the inclusion of Alysham for a minimum allocation of 300 dwellings. Notwithstanding the issues concerning the overall spare capacity and expansion of the waste water treatment works, the Norfolk Homes site is ideally located so as not to be affected by any capacity problems within the sewer network. Subject to resolution of the capacity issue relating to the waste water treatment works this site would be available for development earlier than implied in the housing trajectory (Appendix 6).

Joint Core Strategy Proposed submission Document

O - 11266 - 8541 - Policy 13: Main Towns - ii

11266 Object

CHAPTER 6 Policy 13: Main Towns

Respondent: Redenhall with Harleston Town Council (Mrs Sue Kuzmic) [8541] **Agent:** N/A

Full Text:

Summary: Town suffers car parking and flooding issues which need resolution before development can take place.

Joint Core Strategy Proposed submission Document

O - 11307 - 4736 - Policy 13: Main Towns - i, ii

11307 Object

CHAPTER 6 Policy 13: Main Towns

Respondent: Mr Brian Falk [4736]

Agent: N/A

Full Text:

Summary:

Lack of an appropriate strategy and a reasonable alternative⁶. These are some of the points that would be beneficial and contribute to the soundness of the proposals for a Joint Core Strategy involving Diss and District:

- Recognition that Diss contained within its CITTASKLOW status and with its Roydon-Diss-Scole axis is more than a market town and already forms a separate and thriving growth zone. Its hinterland contains a population in excess of 50,000 whether assessed by activity gravity analysis or by simple footfall plotting and this hinterland, contained between Norwich, Ipswich and Thetford continues to grow in numbers and should be recognised as a (secondary) growth zone in its own right.
- Planning strategy should override the County boundary and take into account both sides of the Waveney valley even if they fall under separate planning regimes with the acceptance of a need for the creation of a planning entity with Mid-Suffolk that can plan for the full area of Diss's hinterland.
- Recognition that a large number of the villages and smaller rural communities listed in the settlement hierarchy look more toward and depend more on Diss than Norwich; the primary linkage of these villages to Diss both by transport, social and leisure facilities is important and has not been adequately recognised.
- Better recognition of the importance of the railway main line with its swift linkage into the financial heart of Britain, the City of London, and the impacts this has had and will continue to have on Diss's growth and needs.
- Recognition of the importance to the whole southern area of the plan of improving road linkage to the critical west-east cross-England A14 dual carriageway and virtual motorway and the East Anglian ports and the need for improved road linkage to this (via Ipswich and Bury St Edmunds) to be improved within an acceptable time-scale.
- The Joint Core Strategy fails entirely to consider or provide for the creation of a strategic green parkway either side and along the River Waveney. (It gives great emphasis to a green infrastructure priority for Norwich.)

Proposals to take advantage of such a green infrastructure opportunity which could so match and fit to Diss's own growth pattern should not be missed, but again will need co-operation with Mid-Suffolk.

Joint Core Strategy Proposed submission Document

S - 11358 - 2592 - Policy 13: Main Towns - None

11358 Support

CHAPTER 6 Policy 13: Main Towns

Respondent: Persimmon Homes (Anglia) (Mr Martin C Davidson) Agent: Bidwells Norwich (309) (Mr Darren Cogman) [4024]
[2592]

Full Text:

Summary:

SITE SPECIFIC REPWe wish to support the identification of Harleston in the Joint Core Strategy Main Towns Policy (policy 13)We can confirm that the site promoted at north of Mendham Lane in Harleston is suitable and available for development and capable of contributing to the policy's requirement to accommodate 200-300 dwellings in the town.We note that the supporting text to policy 13 now states that 'subject to resolution of servicing constraints, these towns wil accommodate additional housing (numbers indicate a minimum number of dwellings)' We welocme this change from earlier versions of the JCS in recognising the advice contained within RSS policy H1 namely, that dwelling numbers should not be expressed as a ceiling which should not be exceeded rather as a minimum target to be achieved.

Joint Core Strategy Proposed submission Document

O - 11439 - 8254 - Policy 13: Main Towns - i, ii

11439 Object

CHAPTER 6 Policy 13: Main Towns

Respondent: Kier Land Ltd [8254]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood)
[7175]

Full Text:

Summary:

Whilst Kier Property welcomes the wording in the Policy 13, which states that 'numbers indicate a minimum number of dwellings' and the proposed allocation of 300 dwellings at Aylsham in Policy 13, the caveat wording of Policy 13 i.e. (subject to overcoming existing sewerage disposal constraints) which is included in the table in UNSOUND. Kier Property's view is that Policy 13 fails the EFFECTIVE soundness test by the inclusion of the caveat in brackets this leaves a level of uncertainty to the allocation process and does not provide a sufficiently robust and clear framework for the Site Allocations process or planning application process. The Water cycle study stage 2b does not indicate that a solution can not be found to the necessary improvements to the Aylsham Sewerage Treatment works. Therefore there appears to be a reasonable prospect to the delivery of the necessary works. Therefore there is no need for the caveated words in brackets. Furthermore, it fails the JUSTIFIED Soundness Test because it is not the most appropriate strategy. The specification of 300 units is an arbitrary cap which is not justified by robust evidence. A better approach would be the identification of at least 300 units. The level of development should be dependent on the ability of the infrastructure to accommodate growth or the ability of infrastructure to be enhanced or improved with Best Available Technology (BAT). Kier notes that statutory consultees such as Norfolk County Council, Anglian Water, NHS Norfolk and Aylsham Town Council have stated that there are no other significant constraints to growth at Aylsham. Kier therefore asserts that an allocation of at least 300 dwellings should be made. In response to previous consultations Kier submitted information regarding land at Burgh Road that demonstrates the site is wholly suitable for future development, without breaching sustainability objectives.

Joint Core Strategy Proposed submission Document

O - 11596 - 8201 - Policy 13: Main Towns - i, ii, iii

11596 Object

CHAPTER 6 Policy 13: Main Towns

Respondent: Spen Hill Developments Limited [8201]

Agent: DPP LLP (Mr Andy Brand) [7527]

Full Text:

Summary:

Whilst our client supports the broad thrust of the Core Strategy and specifically the development of Diss with significant expansion within or adjacent to the town centre, it is considered that the proposed delivery mechanism for this development aspiration is not "sound". Accordingly, this element of the policy fails to meet the requirements of Section 20(5)(b) of the "Planning and Compulsory Act" 2004. The act requires that to be "sound", the plan must be justified, effective, and consistent with national policy. Policy 13 of the emerging Core Strategy identifies the "main towns" within the area, and states that subject to resolution of servicing constraints, these towns will accommodate additional housing, town centre uses, employment and services. Diss is one of the four "main towns" that is identified in the area, and the policy states that the centre is to accommodate a significant expansion of town centre uses, within or adjacent to the town centre. Supporting text to the policy states that the centre has the development potential to accommodate significant floor space, which will be provided on the existing retail allocation adjacent to the town centre. This allocation covers our client's land, and we support its continued allocation for retail purposes. However, the supporting text goes on to consider the delivery strategy. We do not consider that an Area Action Plan is needed to achieve the development of the allocated land: regeneration and development can be achieved more effectively through the submission of a planning allocation. As such, any requirement for an Area Action Plan would fail to meet the test of "soundness". We outline our objections to the requirement for an AAP below. (please see scanned document). In conclusion, Spen Hill Developments Ltd supports the enhancement of Diss town centre, and specifically, the development of Diss with significant expansion within or adjacent to the town centre. However, it is considered that the proposed delivery strategy for this development aspiration is not "sound". The requirement for an AAP has not been justified, is not effective and is inconsistent within national planning policy guidance. The element of the core strategy fails to meet the requirements of Section 20(5)(b) of the "Planning and Compulsory Purchase Act" 2004, and should therefore be deleted from the Strategy.

Joint Core Strategy Proposed submission Document

O - 11609 - 8607 - Policy 13: Main Towns - i, ii, iii

11609 Object

CHAPTER 6 Policy 13: Main Towns

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that the limitation of 300 dwellings only at Aylsham is founded on nothing but a cursory consideration of an arbitrary division of housing requirement figures and infrastructure capacity analysis, specifically sewage. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth in Aylsham is provided. Our client's land interest is the site at Sir Williams Lane, Aylsham which is capable of accommodating up to 500 dwellings and supporting infrastructure. By limiting the scale of growth at Aylsham to 300 dwellings the JCS does not allow for sufficient flexibility in terms of the housing that could be accommodated, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land.

Summary: The JCS sets out some 'grand challenges' at page 6 of the document and it is these that must be realised through the evolving JCS. Chapter 6 of the document ('Policies for Places') covers policies 9 - 19 which apply to defined parts of the plan area. Policy 13 (Main Towns) explains how land will be allocated for residential development broadly of the scale indicated. Aylsham is highlighted as having potential for 300 new homes (subject to overcoming existing sewage disposal constraints). The focus of this representation is to emphasise the sustainable merits of the particular site in question and why it is considered wholly suitable for residential development up to 500 new dwellings. Our representations make the point that the allocation of only 300 dwellings at Aylsham is too conservative given the capacity and capability of the area to accommodate growth over and above this figure. We are primarily seeking a change to Policy 13 of the document and as requested by the GNDP, this statement accompanies a Representation Form pertaining to the specific policy we wish to see changed in advance of adoption of the final JCS. In principle, Landform support the identification of Aylsham for residential development but our position is such that the site has capacity for up to 500 units. Furthermore we do not consider that the allocation has been informed by a reliable and robust evidence base, thereby rendering Policy 13 procedurally unsound. Accordingly these representations request a change to Policy 13 of the JCS Submission version and we ask that the Inspector takes note of our objection and asks us to contribute and comment on the robustness of the JCS at the forthcoming Examination.

1.0 INTRODUCTION

1.1 Barton Willmore LLP has been appointed to represent Landform Strategic Investment Ltd (the client) who currently has a controlling land interest at Sir Williams Lane, Aylsham, which sits within Broadland District.

1.2 Within these representations we consider the three tests of soundness and look at areas of the JCS where we feel modifications are required in order to make the document fully compliant. Specifically, we seek a change to the wording of Policy 13 and explain our justification for our assertion that the proposed levels of housing at Aylsham should be increased.

1.3 Advice on how to prepare the JCS and what to include is contained in PPS12 and various advice notes from PINS and the PAS documents. In particular, we rely on the following advice:

- * PINS "Examining Development Plan Documents Soundness Guidance" (Aug 2009, 2nd edition).
- * PINS "Local Development Frameworks: Examining Development Plan Documents: Learning from Experience" (Sept 2009).
- * PAS "The Plan Making Manual" (2009).

1.4 The pro-forma sent out by GNDP entitled "DPD - Publication (Pre-submission) Stage Representation Form", attached a guidance note summarising the grounds for testing the soundness of the JCS. These are essentially legal compliance and content compliance, including whether the DPD is justified, effective and in accordance with national planning policy.

1.5 The purpose of our representations on the JCS is to summarise the areas of support and objection on the JCS and, where we object, to indicate whether the individual matter is sufficient to find the JCS unsound or whether cumulative objections are sufficient to find the JCS unsound. We provide the reason for objecting and summarise in the conclusions the soundness test the matter appropriately relates to.

1.6 We do not comment on every aspect of the JCS. Our intention is to comment on all sections where we find non-compliance with the tests of soundness. Specifically, our concern in this instance is Policy 13 and the lack of an evidential basis for its content.

1.7 We understand the JCS must, in effect, be an appropriate conclusion of the LDF evidence base and the amount of detail produced in the JCS should be proportionate. The evidence base should inform what is in the plan rather than being collected retrospectively in an attempt to justify the plan. Our objections consider whether the evidence is being produced retrospectively and whether it is absent, flawed or out-of-date in relation to the conclusions drawn in the JCS.

1.8 The spatial vision set out in Section 4 of the JCS sets out a clear distribution strategy for housing and employment and recognises the impacts of development on climate change, the environment, communities and transport.

1.9 We generally support the objectives on pages 24 to 26 but consider Objective 2 must be modified to reflect RSS objectives and policies as follows:

Objections to Spatial Objectives

Objective 2: To allocate "enough" land for housing. **Objection:** This must be changed to reflect RSS Policies H1 and H2 to allocate "at least" the targets expressed. It must also make clear that the target to meet is the RSS requirements at 2021 and not as suggested the target to 2026. The 15 year period for housing projections from the approval of the JCS is not the target date for housing.

1.10 We make the case within these representations that there is no rationale for limiting the proposed growth at Aylsham to 300 dwellings and emphasise that the RSS dictates that housing requirements set out therein are minima, not maxima.

1.11 The site at Sir William's Lane could be comfortably developed in the immediate future for 500 units and would provide valuable community benefits including expansion of Aylsham Town Football Club into a regional centre of excellence and training academy supported by significant Football Association grant. The scheme will also provide additional land for Aylsham High School as part of its recently announced intention to transfer to independent trust status.

1.12 We provide a brief commentary within Chapter 5 of this statement in relation to other JCS policies. On balance we consider the JCS to be sound but are seeking a modification to the wording of Policy 13 to ensure the JCS more accurately reflects the existing and future potential of Aylsham and acknowledges that sewage capacity is not a major constraint on development in the town.

Proposed Level of Housing Provision at Aylsham - Policy 13

1. The JCS identifies under Policy 13 a list of 'Main Towns'. Under this policy, "Land will be allocated for residential development broadly of the

11609 Object

CHAPTER 6 Policy 13: Main Towns

scale indicated below (and subject to detailed assessment including impact on form and character and the resolution of any specific servicing constraints." Aylsham is identified for an allocation of 300 dwellings. Our client's site is promoted as the most logical and wholly sustainable site for a development of up to 500 dwellings. The site has adequate capacity to provide for as many dwellings, specifically with respect to sewage, and our position is such that the wording of Policy 13 must be modified to reflect this.

6.2 The site has been masterplanned in a careful and comprehensive manner for up to 500 units and the proposed development would serve not only to strengthen existing facilities in the town centre by contributing to viability and vitality, but also through the client's collaborative working with Aylsham Town FC and Aylsham High School to deliver a relocation and extension of both facilities. Taking all of this into account along with the indisputable sustainability merits of the scheme and the apparent lack of evidence to justify the limited housing numbers of 300 units, we believe Policy 13 should be amended accordingly. In our view this would serve to make Policy 13 of the JCS compliant with the objectives of the RSS which is to treat housing requirements as minima, not maxima. If the site at Sir Williams Lane can provide a greater number of dwellings without detriment to the surrounding area and in an attractive and pleasant way that brings about substantial community benefits, then the JCS should allow for greater flexibility to do so.

6.3 No 'significant' new infrastructure would be required in order to develop the site at Sir Williams Lane. No major difficulties are envisaged in supplying mains services to the site and the availability of all the service connections has been determined by the appropriate supplier.

6.4 In terms of location, the site is bounded to the east by the A140, to the south by Sir Williams Lane and to the west by Aylsham High School. The A140 provides a direct link to Norwich City Centre and the existing public transport service serving the site and the surrounding area is good.

6.5 The site currently comprises an open field. It is envisaged that access would be gained from a proposed mini roundabout off of Sir Williams Lane. The site is located within a very sustainable location in very close proximity to a range of facilities and the centre of Aylsham, which contains a number of shops and amenities and is approximately 15km from Norwich City by car or bus. Regular bus services operate from Aylsham to Norwich. The nearest train station is North Walsham, approximately 6.5 km. Norwich Coach Station is approximately 15km away and Norwich International Airport is 10km away.

6.6 The description of the site along with the detailed technical analysis already undertaken demonstrates that development would form a natural extension to the existing urban area. Allocation of the site would present a strong opportunity for new development of high quality design in keeping with the semi-rural character of the locality.

6.7 We emphasise that development would make a significant contribution to sustaining the town of Aylsham in the longer term. Our view is that without comprehensive development of the site, the vitality of the town, Football Club and High School are unlikely to be sustained in the longer term. Furthermore our client would expect to make appropriate contributions to essential and local supporting infrastructure through negotiations with the local planning authority at the planning application stage. In terms of environmental constraints no insurmountable problems are apparent and it is considered that the site could be delivered in a sustainable and timely manner.

6.8 The proposed level of growth of circa 500 dwellings could be fully delivered on the Landform site. We consider that the allocation of just 300 dwellings is far too conservative for a town such as Aylsham and would expect to see a greater allocation in the region of 500 or more. We are of the view that the wording and content of Policy 13 must be modified to reflect this for the reasons summarised herein. We do not envisage any insurmountable problems in terms of addressing known site constraints and would reiterate that development of the site is a wholly sustainable and logical option for development that would make a significant contribution to the continued vitality of the village.

6.9 We submit that for the reasons detailed herein, Policy 13 is currently unsound and uninformed by a sound evidence base. It is also arguably uncompliant with the requirements of the RSS which treats housing requirements as minimum, not maximum figures.

Joint Core Strategy Proposed submission Document

S - 11631 - 7523 - Policy 13: Main Towns - None

11631 Support

CHAPTER 6 Policy 13: Main Towns

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

O - 11689 - 8352 - Policy 13: Main Towns - i, ii, iii

11689 Object

CHAPTER 6 Policy 13: Main Towns

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary: Please see comments under Policy 4

Joint Core Strategy Proposed submission Document

S - 11734 - 1776 - Policy 13: Main Towns - None

11734 Support

CHAPTER 6 Policy 13: Main Towns

Respondent: Aylsham Town Council (Mrs M E Anderson-Dungar) [1776]

Agent: N/A

Full Text: THIS SUBMISSION WAS RECEIVED AFTER THE PUBLICATION STAGE ENDED

Summary: Refers to Paragraph 6.34 The Council considers the document to be legally compliant and sound, but in respect of paragraph 6.34 of Policy 13, the Town Council would like clarification and quantification of the sentence "The Town also has the potential for limited new shopping floor space up to 2016, which will require the suitable expansion of the town centre."

Joint Core Strategy Proposed submission Document

O - 11173 - 8320 - Policy 14: Key Service Centres - i, ii, iii

11173 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Sunguard Homes [8320]

Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text:

This representation is submitted on behalf of Sunguard and whilst we support the designation of Long Stratton as a Key Service Centre, it should be made clear that Long Stratton includes a small part of Tharston Parish off Chequers Road, which in planning terms since the 1970s has been included as part of Long Stratton and has been developed accordingly. Recent developments in Tharston include the Tharston Industrial Estate, the recently built housing development at Jermyn Way, the Long Stratton Health Centre and part of the South Norfolk Council office complex. It is therefore considered that specific reference should be made in the policy and accompanying text about this part of Tharston and that the the list of service centre names should be amended to Long Stratton/Tharston(Chequers Road) in a similar manner as has occurred with Poringland/Framingham Earl and Loddon/Chedgrave.It should also be noted that there is some scope for development in Long Stratton/Tharston in advance of the provision of a bypass, which could fund highways improvements until a bypass is built, which is clearly a long term prospect at the present time. It has been agreed with the Norfolk County Council Planning and Transportation Department that the residential development of Sunguard's land off Chequers Road would be acceptable in highways terms prior to the building of a bypass, subject to further enhancement of the traffic signals at the A140 which Sunguard installed in 2000 as part of an earlier phase of development. In this respect, the housing trajectory shown for Long Stratton in Appendix 6 is incorrect as Sunguard's Chequers Road site would be deliverable much earlier than the earliest date of 2017/18 shown for Long Stratton, presumably reflecting the potential opening date of a Long Stratton bypass. The Sunguard site which would not be dependant on a bypass being constructed could accommodate up to approximately 150 dwellings and would be available for development as soon as planning and any other consents were obtained, which could be by late 2010/2011.

Summary:

The Chequers Road part of Tharston, which in planning terms is an integral part of Long Stratton, has not been referred to in the policy 14 or the supporting text.No reference has been made in policy 14 or the supporting text that a limited amount of residential development can be undertaken prior to the construction of a Long Stratton bypass.The housing trajectory for Long Stratton in Appendix 6 should be amended to include Chequers Road, Tharston alongside Long Stratton and show the potential development of approximately 150 houses from 2010/11 onwards.

Joint Core Strategy Proposed submission Document

S - 11177 - 7620 - Policy 14: Key Service Centres - None

11177 Support

CHAPTER 6 Policy 14: Key Service Centres

Respondent: IE Homes & Property Ltd (Mr Ed Palmieri) [7620] **Agent:** N/A

Full Text: 1800 new homes at Long Stratton is sustainable.

Summary: 1800 new homes at Long Stratton is sustainable.

Joint Core Strategy Proposed submission Document

O - 11203 - 8500 - Policy 14: Key Service Centres - i, ii, iii

11203 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr Hugh Ivins [8500]

Agent: Mr Hugh Ivins [8500]

Full Text: The proposed allocation of '100 to 200 dwellings' for Reepham represents a wide range and is imprecise. Greater certainty is required for the number of dwellings proposed in this Key Service Centre. The difference of 100 dwellings can have a significant impact in Reepham. In respect of para 6.55 Reepham now has a Sixth Form College giving all the more reason to have a more specific housing allocation.

Summary: The proposed allocation of '100 to 200 dwellings' for Reepham represents a wide range and is imprecise. Greater certainty is required for the number of dwellings proposed in this Key Service Centre. The difference of 100 dwellings can have a significant impact in Reepham. In respect of para 6.55 Reepham now has a Sixth Form College giving all the more reason to have a more specific housing allocation.

Joint Core Strategy Proposed submission Document

O - 11204 - 8507 - Policy 14: Key Service Centres - i, ii

11204 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr R Smith [8507]

Agent: Beacon Planning Ltd (Ms Jenny Page) [7833]

Full Text:

This is the only policy which gives some scope to deliver additional development in settlements within the NPA and this principle is supported. However, the policy does not allocate the number of dwellings for each settlement in a consistent or sustainable manner. The allocation does not recognise the infrastructure constraints at individual settlements and therefore the ability to deliver the required allocations both within and outside the NPA. Further the reasoning behind the size of allocations to individual settlements is not clear. Some of the settlements have significant infrastructure constraints to address before development. In this economic climate development in these locations is very likely to be at best delayed. It is short-sighted to severely restrict development in other settlements which can accommodate additional development of an appropriate scale without a detrimental impact on the environment or place undue strain on current infrastructure. The policy does not state when the sites will be considered for additional development or what would trigger this. Further it is the smaller sites, especially those with few constraints that can be delivered early in the Plan period. As such the policy should not limit the additional development to just delivering the housing target smaller sites in the NPA allowance. It would be foolish to limit this if appropriate sites which meet with environmental and amenity requirements can make a contribution to meeting housing targets. Effective: Failure to consider the ability of the LDF to meet the housing targets within the Plan period and to consider other strategies which may enable delivery of housing if appropriate funding is not forthcoming. Inconsistency in the number of dwellings allocated to each settlement when considered against infrastructure constraints and consequently the ability to develop the individual sites. Justified: Failure to make appropriate assumptions or to consider reasonable alternatives. Failure to incorporate sufficient flexibility to deal with different funding scenarios, a drop in housing delivery or include appropriate remedial actions. Given the current economic situation this is vital. Para 6.44 Justified: Failure to make reasonable assumptions about the impact of development on environmental protection areas Blofield is included within a list of settlements close to the Broads. The paragraph refers to protecting the Broadland SPA, Broads Ramsar and Broads SAC. It is appreciated that the Broads are an internationally important environmental area and major tourism facility. However, Blofield is not in close proximity of any such environmental designations. The nearest being on the south side of the settlement of Brundall, along the River Yare as shown on Natural England MAGIC interactive map. Para 6.45 Effective: Does not acknowledge ability to deliver development in the face of a lack of infrastructure funding. This paragraph does not acknowledge that almost all the key services centres have infrastructure constraints which will need commitment and major investment upfront and from local authority partners including utilities providers. Given this the provision of housing at the majority of settlements is entirely dependent upon the implementation of essential infrastructure which could prevent or at best delay development. Those settlements with few infrastructure constraints are the most appropriate for additional development as they can be delivered early in the Plan period. Para 6.46 Justified: Fails to reflect background evidence. This does not recognise the advice set out in the GNDP Topic Paper: Settlement Hierarchy at section 5 that new housing development at Acle should be low down the ranges proposed, i.e. 100 rather than 200. Para 6.47 Justified: fails to reflect background evidence. There is no recognition is given to the good public transport links with Norwich. Further, it is considered that the location and proximity to major routes should be criteria which are considered in considering the sustainability of settlements. It is reasonable to assume that those settlements close to Norwich with access to good public transport services are more likely to use them. The short journey times with consequently fewer stops make the use of buses more attractive. In contrast residents in those settlements more remote from Norwich will inevitably compare the time taken to travel by bus and car to reach their chosen destinations. The GNDP Topic Paper: Settlement Hierarchy notes that for development to take place in any of the key service centres there will need to be some expansion in schools. It is noted that for Blofield it states that the primary school may need small scale expansion and potentially could double the growth provisions. Notwithstanding other constraints it would seem that there would then be capacity for Blofield to accommodate 100 dwellings. This is the only infrastructure constraint for development in Blofield. Para 6.51 Justified: Fails to reflect background evidence. This wording recognises that there is a shortfall in capacity at the high school which would need to be overcome. But it does not recognise the advice set out in the GNDP Topic Paper: Settlement Hierarchy at section 5 that new housing development at Loddon and Chedgrave should be low down the ranges proposed, i.e. 100 rather than 200. Para 6.52 Justified: Fails to reflect background evidence. The description of Long Stratton does not highlight the evidence in the GNDP Topic Paper: Settlement Hierarchy that given the need to upgrade some waste water treatment works new housing development would need to be phased to later in the strategy period. Para 6.54 Justified: Fails to reflect background evidence. The description of Poringland does not highlight the evidence in the GNDP Topic Paper: Settlement Hierarchy that there are drainage and spring induced problems affecting some areas.

Summary:

Only policy with scope to deliver additional development in settlements, but does not state when sites will be considered or what would trigger this. Does not allocate the number of dwellings for each settlement in a consistent or sustainable manner. Does not recognise the infrastructure constraints at individual settlements. In this economic climate development in locations with such constraints is very likely to be at best delayed. Short-sighted to restrict additional development in settlements or sites, of an appropriate scale without a detrimental impact on the environment or place undue strain on current infrastructure.

Joint Core Strategy Proposed submission Document

O - 11213 - 6762 - Policy 14: Key Service Centres - i

11213 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Loddon PC (Chris Smith) [6762]

Agent: N/A

Full Text:

Loddon Parish Council does not agree that the building of a further 100-200 houses is appropriate because of the following concerns:1. There is a serious problem with capacity at Hobart High School and mobile classrooms are currently in use. There is no provision for post 16 education in Loddon and the nearest sixth form or further education colleges are approximately 15 miles away.2. There are serious problems with the sewage system and regular breakdowns at the pumping stations are being experienced. There have been several occurrences in recent years of untreated sewage being pumped directly into the River Chet due to pump failure.3. The range of shops is limited and Loddon is not perceived as a shopping centre. The majority of residents travel to Beccles or Norwich to shop.4. There is no evidence that there would be any local jobs for new residents and there is already extreme pressure on the bus services to and from Norwich at peak times with them sometimes being overfull and unable to take all the passengers.5. There is a problem with traffic congestion and shortage of parking in the centre of the village. There is also difficulty getting on to the A146 bypass at peak times with waits in excess of 10 minutes being common in the morning rush hour. These problems would be exacerbated if additional houses were built unless a roundabout was created at one of the A146 junctions and an additional car park was provided in the village centre. Traffic problems in the centre already make it difficult for the retained firefighters to reach the fire station quickly as the fire station is located in the centre of the High Street.

Summary:

Loddon Parish Council objects to additional houses being built because of the following concerns1. Capacity shortage at High School. Nearest sixth form provision approx 15 miles away.2. Existing sewage capacity problems and pump failures exacerbated3. Limited range of shops4. Lack of local employment opportunities5. Traffic, parking and public transport issues. Delayed access to Fire Station.

Joint Core Strategy Proposed submission Document

S - 11287 - 2373 - Policy 14: Key Service Centres - None

11287 Support

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Persimmon Homes (Anglia) [2373]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

Policy 14 concerns Key Service Centres and identifies Long Stratton as such. It is also located within the Norwich Policy Area and therefore may be considered for additional development over and above the 1,800 dwellings allocated under Policy 10. Paragraph 6.52 goes on to state that depending on the level of commercial growth that occurs, this could move Long Stratton towards Main Town status. However, it is important that there is sufficient development proposed in order to fund the proposed bypass. The uncertainties surrounding the delivery of the bypass must not be allowed to undermine early delivery of housing in Long Stratton where appropriate small-scale sites can be delivered without the need for the bypass. The bypass should be linked to the strategic scale of development proposed at Long Stratton and not be used to prevent small-scale sites in the town coming forward.

Joint Core Strategy Proposed submission Document

S - 11360 - 6362 - Policy 14: Key Service Centres - None

11360 Support

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr A Semmence [6362]

Agent: Bidwells Norwich (309) (Mr Darren Cogman) [4024]

Full Text:

Summary:

SITE SPECIFIC REPI wish to offer qualified support to the identification of Hingham in the JCS Key Service Centres Policy (Policy 14).I can confirm that the site promoted at land off Hall Close in Hingham is suitable and available for development and capable of contributing to the policy's requirement to accommodate 'approximately 100 dwellings' (Proposed submission document wording; Policy 14, and para.6.50).Notwithstanding this broad support I would request the following non substantive change:The dwelling number for Hingham, in accordance with the East of England Plan (Regional Spatial Strategy - RSS) should not be expressed as a ceiling to development, rather as a minimum target (Policy H1). Accordingly Policy 14: Key Service Centres (Hingham) should be amended to accord with the RSS by accommodation 'at least 100 new dwellings'.

Joint Core Strategy Proposed submission Document

O - 11363 - 8047 - Policy 14: Key Service Centres - i, ii

11363 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: **Wroxham Parish Council (Mrs Daphne Wyatt)**
[8047]

Agent: **N/A**

Full Text:

Summary:

WROXHAM page 82 6.56ls neither justified, sound or effective and we wish our case to be heard by the Inspector. Wroxham Parish Council supported by a large number of parishioners, clearly established their opposition to the development of agricultural land to the South of the Parish development boundary. This farmland has long been designated as an Area of Landscape Value and we regard it as a Quality Environmental Asset to the Parish. In our response to Broadland Assessment April 2008 we set out our continued opposition to development on areas of Landscape Value in the South of the Parish and have maintained that position in every document we have responded to on the Local Development Framework. Any housing development required should be placed on Brownfield sites in other parts of the Parish. Clarifying some of the inaccuracies in 6.56. While there is an amicable working relationship between Wroxham and Hoveton Parish Council, Hoveton is a separate entity, divided from Wroxham by the River Bure and is the Key Service Centre and Service Village. Hoveton has Shops, Railway Station, Schools, Banking facilities, Doctors Surgery and majority of Boatyards are therefore employment opportunities. HOVETON is in a separate Parliamentary and County Council division and is part of North Norfolk District Council and has the good fortune to have no part in the Greater Norwich Development Partnership. Wroxham has one boat building and two hire boatyards, few shops and no significant employment opportunities. The Bridge over the Bure is a few hundred years old and has always offered some constraint to through traffic. The principle constraint to traffic movement through Wroxham and Hoveton is due to continued development in Hoveton over the years which has resulted in an inadequate traffic management scheme in Hoveton. Norfolk County Council were right about the need for a By-pass fifteen years ago. N.B. The photograph on Pg 83 is not Wroxham, however Hoveton are very grateful for the advertising.

Joint Core Strategy Proposed submission Document

S - 11368 - 8574 - Policy 14: Key Service Centres - None

11368 Support

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr Paul Rogers [8574]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood)
[7175]

Full Text:

Summary: We support the identification of Wroxham as a key service centre in policy 14. However we are concerned about the definition of the number of dwellings. This is subject to a separate representation

Joint Core Strategy Proposed submission Document

O - 11377 - 8627 - Policy 14: Key Service Centres - i, ii

11377 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: Whilst we generally support this policy, we do have concerns with regard to directing the proposed 1,000 and 1,800 new homes to Hethersett and Long Stratton respectively. Such growth is disproportionate given their key service centre status and in Long Stratton relates to a road proposal and in Hethersett misunderstands the gap policy. We note that settlements identified in Policy 14, which are also covered by the NPA, may be considered for additional development, and would therefore increase the overall delivery of housing, which we would support. However, with respect to Long Stratton and Hethersett, we would highlight the fact that, whilst the other Key Service Centres are all allocated 50 to 200 new homes, Hethersett is allocated 1,000 and Long Stratton 1,800. This indicates that both will experience growth considerably beyond their existing scale and status as Key Service Centres, which raises concern over their deliverability, since both lack the necessary existing infrastructure to bring growth forward. This concern is heightened given the lack of a detailed Delivery Plan for key infrastructure, highlighted later in this report. The need exists to examine in some detail the Easton enigma.

Joint Core Strategy Proposed submission Document

O - 11379 - 8574 - Policy 14: Key Service Centres - i, ii

11379 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr Paul Rogers [8574]

Agent: Bidwells Norwich (309) (Mrs Isabel Lockwood)
[7175]

Full Text:

Summary:

Paul Rogers welcomes the identification of Wrexham as a key service centre in policy 14. We do not think that the policy is fundamentally unsound but considers that the the arbitrary cap of 200 dwellings in the village is unsound but can be rectified with a non-substantive change. It fails the JUSTIFIED soundness test because it is not the most appropriate strategy. The specification of 100-200 units is an arbitrary cap which is not justified by robust evidence. A better approach would be the identification of at least 200 units. The level of development should be dependent on the ability of the infrastructure to accommodate growth or the ability of the infrastructure to be enhanced or improved with best available technology (BAT). The approach in policy 14 reflected in Para 6.56 is inconsistent with policy 13. The text of policy 13 states that inner alia 'the numbers' in the table indicate 'a minimum number of dwellings'. This reflects guidance in the East of England Plan which states that the numbers should be a minimum not a ceiling. However, policy 14 and Para 6.56 gives no acknowledgment to this approach. It is therefore our view that the policy is not justified. In response to previous consultation Paul Rogers has submitted information that demonstrates that land to the south of Wroxham is wholly suitable for future development in terms access, community character, environment and resources. The development can be accommodated without breaching sustainability objectives. Para 6.56 sets out that 'investment must provide improved community facilities' Reg 25 consultation evidence report dated 18.12.08 noted that Wroxham the relocation of the football club, has been a long held local aspiration, which could be brought forward by development. In order to meet this further work would be needed to assess the viability of delivery of any necessary infrastructure plus the community facilities. Therefore until viability work is completed the arbitrary limit 100-200 units is considered to be unsound with regards to the effective test as it might limit delivery

Joint Core Strategy Proposed submission Document

S - 11513 - 8592 - Policy 14: Key Service Centres - None

11513 Support

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr Charles Birch (Trustees of the Trafford Trust Estate) [8592] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: Policy 14 Key Service Centres We endorse the identification of Wroxham as a KSC. We consider that land can be identified for approx 200 dwellings at the southern gateway to the settlement without impinging upon the form/character of Wroxham, its landscape setting or the Broads. We endorse comment in para 6.44 We agree with description of Wroxham in para 6.56 Taken together, Wroxham & Hoveton contain significant local employment and services, including a secondary school. They have rail access and form a major centre for broads tourism We agree with para 6.56 which says Wroxham could support the development of up to 200 dwellings by 2026, and fits with NNDC LDF pages 168 and 171 together with para 5.4.10 of the JCS SA report back up, and we agree that Wroxham should be a significant KSC, and play its role in the implementation of the spatial policy framework for the area, and up to 200 dwellings will not have a detrimental measurable effect upon the character of the settlement.

Joint Core Strategy Proposed submission Document

O - 11515 - 8300 - Policy 14: Key Service Centres - i, iii

11515 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Phillip Jeans Homes Ltd [8300]

Agent: Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text:

Summary:

The evidence base that underpins the submitted strategy is fundamentally flawed and our position is such that the limitation of 100 - 200 dwellings only at Loddon and indeed many of the other key settlements in the Plan, is founded on nothing but a cursory consideration of population totals within these settlements and an approximate division of housing requirements figures between these areas based on this sole demographic factor. This is our interpretation of the GNDP's approach and as far as we can see there is nothing within the document or the evidence base to suggest otherwise. The submitted JCS does nothing to explain why the housing figures have been divided in this way and no reasoned justification for the proposed level of growth within these settlements is provided. All that is offered is a brief description of the scale and nature of towns without any real rationale as to how this correlates with the housing figures proposed. Our Client's site at George Lane, Loddon (appendix 1) is capable of accommodating up to 300 dwellings. It is highly sustainable, but limiting the growth to 100-200 dwellings the core strategy does not allow for sufficient flexibility in terms of the housing that could be accommodated given a wider facility base available, fails to take account of the fact that the RSS figures are minima, not maxima and furthermore fails to reflect the advice of PPS1 which requires development to make the best and most efficient use of land. The upper limit of 200 (for Loddon) should now be increased as the SCLAA document informs the decision maker that greater than 300 can be achieved on suitable sites.

Joint Core Strategy Proposed submission Document

O - 11586 - 8591 - Policy 14: Key Service Centres - i, ii

11586 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We concur with the content of paragraph 6.52 of the PSD. We have noted that the GNDP acknowledges that Long Stratton "also benefits from reasonable bus links to Norwich." This service will be substantially enhanced by the implementation of the growth proposals, securing a high quality facility for both existing and new residents. Journey times and reliability will be improved as the provision of the bypass will remove the present congestion and related delay to the bus service experienced to the centre of Long Stratton. We endorse the observations at paragraph 6.52 regarding the benefits to be derived from the bypass and the fact that it will be funded by the growth being directed to the settlement. We endorse the observation at paragraph 6.52 of the PSD. The "whole settlement" approach to the development of Long Stratton anticipated at paragraph 6.13 of the PSD will require the preparation of a master plan outlining the changes to the town's function that will arise as a result of the implementation of the JCS. The implications of the policy framework described in the PSD are such that Long Stratton will attain Main Town status. That change in role should be described in Policy 14. We endorse the comment at Policy 14. Long Stratton is noted within Policy 14 to be a settlement capable of accommodating at least 1,800 dwellings. Policy 9 of the PSD refers to the capacity of South Norfolk. If necessary, a proportion of that element of growth could be assigned to Long Stratton as suggested in Policy 14. We endorse the content of paragraph 6.53 of the PSD which states that journey times and reliability of bus services emanating from Long Stratton "will be improved through infrastructure investment from the approach to Norwich Southern Bypass to the city centre." We consider that the JCS should not refer to Long Stratton as a Key Service Centre but include it in Policy 13 as a Main Town.

Joint Core Strategy Proposed submission Document

S - 11632 - 7523 - Policy 14: Key Service Centres - None

11632 Support

CHAPTER 6 Policy 14: Key Service Centres

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

O - 11674 - 8511 - Policy 14: Key Service Centres - i, ii, iii

11674 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

It is clear from a comparison of the proposed levels of development in the Key Service Centres that the proposed allocation for Long Stratton is inconsistent with the approach taken in other settlements. The next highest figure is the 1,000 dwellings at Hethersett. However, this location will benefit from the proposed Bus Rapid Transit service along the A11 corridor, which will link Wymondham and Norwich. There will be a range of local employment opportunities, services and facilities, within reach of this high quality public transport service. In comparison with Hethersett, Long Stratton is a far less sustainable location for new development. We have set out, in our objections to Policies 9 and 10, that the proposed development at Long Stratton will simply lead to an increase in car journeys, and a highly unsustainable form of development. The proposed allocation will also draw housing away from more sustainable locations, such as Wymondham. This will in turn draw funding away from, for instance, sustainable transport infrastructure on the A11 corridor. The Sustainability Appraisal and the technical evidence base also leads to the conclusion that Wymondham would be a more suitable location for development than Long Stratton. We also object to the reference in paragraph 6.52 to Long Stratton having 'reasonable bus links to Norwich.' The current bus service, with around one service each 30 minutes throughout the day to the early evening, with little or no service during the evenings and on Sundays, would be inadequate to meet the demands of an expanded population. The proposed development would effectively double the village's population with the addition of 3,817 people. The current bus service could certainly not meet the demands which substantial commuting to Norwich would create, or those for leisure use or shopping trips. It also appears unlikely that the proposed development would be able to make any significant contributions towards an improvement in this service, due to the other substantial infrastructure burdens which it would face. The statement in paragraph 6.52 that the proposed growth in Long Stratton may move it towards Main Town status is inconsistent with the strategy outlined by the East of England Plan. Paragraph 6.1 of the Core Strategy notes that the East of England Plan identifies Norwich as a Key Centre for Development and Change, and that the Norwich Policy Area is identified as the location for the growth related to Norwich. Paragraph 13.68 of the East of England Plan describes the Norwich Policy Area as 'the urban area, the first ring of villages and the market town of Wymondham'. This description does not appear to include Long Stratton, which is a village somewhat removed from the rest of the Norwich Policy Area. There appears to be no justification in terms of regional policy for the significant allocation which is proposed at Long Stratton, particularly if this is to alter the nature of the settlement. This approach has not been tested and approved at Regional level, and is therefore inappropriate at this local level.

Joint Core Strategy Proposed submission Document

O - 11690 - 8352 - Policy 14: Key Service Centres - i, ii, iii

11690 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] Agent: N/A

Full Text:

Summary: Please see comments under Policy 4

Joint Core Strategy Proposed submission Document

O - 11691 - 8352 - Policy 14: Key Service Centres - iii

11691 Object

CHAPTER 6 Policy 14: Key Service Centres

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] **Agent:** N/A

Full Text:

Summary: The Poringland/Framingham Earl area has had a long history of surface water flooding. These issues have seen the formation of the DEFRA funded Poringland Integrated Urban Drainage (IDU) project to look at the flooding issues in the area and propose schemes to alleviate the problem, the aspiration being the development of a more integrated urban drainage management scheme within the area. The importance of ensuring the correct disposal of surface water is given high priority within Planning Policy Statement (PPS) 25: Development and Flood Risk. Paragraph F1 of PPS 25 states that "the sustainable management of rainfall, described as surface water, is an essential element of reducing future flood risk to both the site and its surroundings". Furthermore, paragraph F3 states that "the effect of development is generally to reduce the permeability of at least part of the site. This markedly changes the site's response to rainfall. Without specific measures, the volume of water that runs off the site and the peak run-off flow rate is likely to increase. Inadequate surface water drainage arrangements in new development can threaten the development itself and increase the risk of flooding to others". Policy 14 proposes 1-200 dwellings within the area of Poringland and Framingham Earl. However, no consideration has been made within the policy or the supporting text to the issues surrounding surface water flooding. Any hardstanding within the Poringland/Framingham Earl area could dramatically increase flood risk to an area already suffering from surface water flooding issues. For this reason, any new planning application will have to thoroughly scrutinise the flood risk posed by the development to ensure that flood risk both on and off site is not increased and to ensure compliance with PPS 25.

Joint Core Strategy Proposed submission Document

S - 11164 - 8466 - Policy 15: Service villages - None

11164 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Richard Rallison [8466]

Agent: N/A

Full Text: There is a need for further small scale development in these areas to preserve and maintain the existing communities. We must ensure that suitable homes are built to encourage families. In turn this will help support good quality local pre-school and school facilities. Children living and learning in their local areas will have a greater sense of community than those who may need to travel considerable distances to schools.

Summary: There is a need for further small scale development in these areas to preserve and maintain the existing communities. We must ensure that suitable homes are built to encourage families. In turn this will help support good quality local pre-school and school facilities. Children living and learning in their local areas will have a greater sense of community than those who may need to travel considerable distances to schools.

Joint Core Strategy Proposed submission Document

S - 11178 - 7620 - Policy 15: Service villages - None

11178 Support

CHAPTER 6 Policy 15: Service villages

Respondent: IE Homes & Property Ltd (Mr Ed Palmieri) [7620] **Agent:** N/A

Full Text: Support the flexible approach to allocating additional new housing numbers above the suggested minimum in service villages which are higher level in this category and so present more sustainable development locations such as service villages like Tasburgh on A140 and close to Long Stratton. This will ensure sustainable delivery of the 1800 new homes on smaller sites in S Norfolk NPA.

Summary: Support the flexible approach to allocating additional new housing numbers above the suggested minimum in service villages which are higher level in this category and so present more sustainable development locations such as service villages like Tasburgh on A140 and close to Long Stratton. This will ensure sustainable delivery of the 1800 new homes on smaller sites in S Norfolk NPA.

Joint Core Strategy Proposed submission Document

O - 11198 - 8494 - Policy 15: Service villages - i, ii

11198 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Dennis Jeans [8494]

Agent: Mr David Lander [8493]

Full Text: We object to the third paragraph as regards Rackheath. Like the villages marked with asterisks in the second paragraph it lies in the Norwich Policy Area. Those villages are the subject of additional guidance in the fourth paragraph to the effect that they will be eligible for consideration in accommodating the additional 2,000 dwellings provision in Policy 9, no indication to the same effect is given in respect of Rackheath. It is acknowledged that a substantial element of the village is included in the Growth Triangle but except where any proposals fall to be considered as part of the major scheme proposed for that area, the JCS currently gives no guidance on development strategy for other schemes at Rackheath, whether inside or outside the Growth Triangle. Because of the inter-relationship between Rackheath and the Growth Triangle additional text is required to clarify development strategy generally for Rackheath and to allow for smaller scale schemes to come forward in appropriate circumstances.

Summary: Additional guidance is required in Policy 15 to clarify the potential for smaller scale development schemes at Rackheath which are not part of the main Growth Triangle development.

Joint Core Strategy Proposed submission Document

S - 11199 - 8495 - Policy 15: Service villages - None

11199 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr & Mrs George Watson [8495]

Agent: N/A

Full Text: We live at Home Farm and own a potential development site adjacent to existing built up areas between Great and Little Plumstead. We support the policy on Service villages but are concerned on the proposed capacity restrictions. We consider that our land offers the potential for a retirement/residential care home development that would provide sustainable local employment (without the need for daily travel into Norwich) and deliver a development that would provide quality living environment attractive to people living locally who are concerned about moving out of the area to find suitable facilities for their later years.

Summary: We live at Home Farm and own a potential development site adjacent to existing built up areas between Great and Little Plumstead. We support the policy on Service villages but are concerned on the proposed capacity restrictions. We consider that our land offers the potential for a retirement/residential care home development that would provide sustainable local employment (without the need for daily travel into Norwich) and deliver a development that would provide quality living environment attractive to people living locally who are concerned about moving out of the area to find suitable facilities for their later years.

Joint Core Strategy Proposed submission Document

O - 11205 - 8500 - Policy 15: Service villages - i, ii, iii

11205 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Hugh Ivins [8500]

Agent: Mr Hugh Ivins [8500]

Full Text: The proposed allocation of '10-20 dwellings per village' while representing a not insignificant range of 430 dwellings (430-860 dwellings), needs to be more precise at this stage of the consultation exercise, particularly as it concerns some 58 settlements including, Horsham St Faith & Newton St Faith as a single settlement. There is no doubt that there will be a higher demand for housing in the Norwich fringe parishes.

Summary: The proposed allocation of '10-20 dwellings per village' while representing a not insignificant range of 430 dwellings (430-860 dwellings), needs to be more precise at this stage of the consultation exercise, particularly as it concerns some 58 settlements including, Horsham St Faith & Newton St Faith as a single settlement. There is no doubt that there will be a higher demand for housing in the Norwich fringe parishes.

Joint Core Strategy Proposed submission Document

S - 11209 - 8500 - Policy 15: Service villages - None

11209 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Hugh Ivins [8500]

Agent: Mr Hugh Ivins [8500]

Full Text: Strongly support the inclusion of Swainsthorpe in Policy 16 Other Villages to accommodate infill mor small groups of dwellings, subject to an agreed development boundary and form and character considerations. Swainsthorpe is ideally located adjacent to the A140 and close is enough to Norwich and able to accommodate further residential development.

Summary: Strongly support the inclusion of Swainsthorpe in Policy 16 Other Villages to accommodate infill mor small groups of dwellings, subject to an agreed development boundary and form and character considerations. Swainsthorpe is ideally located adjacent to the A140 and close is enough to Norwich and able to accommodate further residential development.

Joint Core Strategy Proposed submission Document

S - 11214 - 8520 - Policy 15: Service villages - None

11214 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Brooke Parish Council [8520]

Agent: Mr Edward Jinks [6740]

Full Text: Brooke Parish Council supports the main principles of Policy 15, and the inclusion of Brooke in this category, but is concerned about paragraph 6.58. The final sentence refers to additional allocations of dwellings to meet the total housing provision target, which would effectively override the other parts of Policy 15, and make it very difficult to restrict development to the range 10-20 new dwellings. For this reason the final sentence of para 6.58 should be deleted.

Summary: Brooke Parish Council supports the main principles of Policy 15, and the inclusion of Brooke in this category, but is concerned about paragraph 6.58. The final sentence refers to additional allocations of dwellings to meet the total housing provision target, which would effectively override the other parts of Policy 15, and make it very difficult to restrict development to the range 10-20 new dwellings. For this reason the final sentence of para 6.58 should be deleted.

Joint Core Strategy Proposed submission Document

S - 11219 - 8544 - Policy 15: Service villages - None

11219 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Ditchingham Estate [8544]

Agent: Peacock Short Ltd (Georgina Challis) [7610]

Full Text:

We are instructed by the Ditchingham Estate to make representations in response to the Council's Pre-Submission Consultation Document. Our clients support Proposed Policy 15 which identifies Broome and Ditchingham as 'Service Villages' where land will be allocated for housing development. Both villages contain a range of facilities and services and are both appropriate locations for residential and commercial development. There are demonstrable economic, social and environmental benefits to be gained from small scale development within proposed 'Service Villages'. South Norfolk is predominantly a rural area and an adequate supply of land for future housing and employment development should be allocated over the plan period. The allocation of land within 'Service Villages' for housing will allow these villages to continue to grow, will contribute to their vitality, prosperity and will contribute to realising the housing targets set out within the Joint Core Strategy. Sustainable development cannot be based solely on strategies of urban concentration. An integrated approach is required where housing and jobs are located in rural areas as well as urban areas.

Summary:

Please see full representation.

Joint Core Strategy Proposed submission Document

S - 11255 - 7606 - Policy 15: Service villages - None

11255 Support

CHAPTER 6 Policy 15: Service villages

Respondent: The Greetham Trustees [7606]

Agent: Strutt and Parker (Mr David Williams) [7605]

Full Text: Strutt and Parker support the allocation of Spooner Row as a service village and that due to the village's location in the Norwich Policy area, that an increased level of development can be accommodated in the village over and above that stated in Policy 15 of the submission document.

Summary: Strutt and Parker support the allocation of Spooner Row as a service village and that due to the village's location in the Norwich Policy area, that an increased level of development can be accommodated in the village over and above that stated in Policy 15 of the submission document.

Joint Core Strategy Proposed submission Document

S - 11275 - 6972 - Policy 15: Service villages - None

11275 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Robert Debbage [6972]

Agent: N/A

Full Text:

Summary: I wish to support the identification of Bergh Apton in the JCS Service Villages Policy (Policy 15).I can confirm that the site promoted at "the gardens" and "corner House" in Bergh Apton is suitable and available for development and capable of contributing to the policy's requirment to accommodate at least 10-20 dwellings in the village.

Joint Core Strategy Proposed submission Document

S - 11280 - 8284 - Policy 15: Service villages - None

11280 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr G Mackintosh [8284]

Agent: N/A

Full Text:

Summary: I wish to support the identification of Barford in the JCS Service Villages Policy (Policy 15). I can confirm that the site promoted at Cock Street in Barford is suitable and available for development and capable of contributing to the policy's requirements to accommodate at least 10-20 dwellings in the village.

Joint Core Strategy Proposed submission Document

O - 11291 - 8479 - Policy 15: Service villages - ii

11291 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Chris Mutten [8479]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary:

We support the designation of Service Villages and the criteria associated with defining the specific villages which fall within this category. However, it is considered that within this policy there should be reference to the range of dwellings which are likely to be accepted within these areas as well as reference to the circumstances where more than 20 dwellings may be exceeded. Settlements such as Reedham already have a greater service provision than the identified criteria such as public houses, medical centre and a post office, and therefore have the ability to accommodate a greater number than the threshold identified. The policy as currently worded does not set out the anticipated targets or allow for circumstances where sites coming forward can preserve or improve local services. We acknowledge that this is allowed for in paragraph 6.58 of the supporting text but we consider this is of such significance that it should be contained within the policy wording to avoid any disagreements at the planning application stage.

Joint Core Strategy Proposed submission Document

S - 11305 - 8564 - Policy 15: Service villages - None

11305 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Harcombe Developments Ltd (Mr Gareth Bearman) Agent: N/A
[8564]

Full Text:

Summary: I wish to support the identification of Seething in the JCS Service Villages Policy (Policy 15). I can confirm that the site promoted at Wheelers Lane in Seething is suitable and available for development and capable of contributing to the policy's requirement to accommodate at least 10-20 dwellings in the village.

Joint Core Strategy Proposed submission Document

O - 11308 - 4736 - Policy 15: Service villages - i, ii

11308 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Brian Falk [4736]

Agent: N/A

Full Text:

Summary:

7. The character and social life of Norfolk outside towns is defined by villages and hamlets. If these are to survive and benefit from the twelve spatial planning objectives held to be the objective of the core strategy they have to be permitted change and to grow, albeit slowly. For 'Other' and 'Smaller' villages and communities the too tightly defined development boundaries, as currently exist, and are confirmed as strategy policy, is effectively a policy for decay and decline. A more realistic and publicly acceptable future for these small communities of character would offer a more sound planning approach. 8. Just one example of the dangers, difficulties and errors inherent in the defining of villages within the three categories is as they affect my own 'Diss-support' village of Bressingham. This is designated as an 'Other Village', but it better falls into the category of a 'Service Village' as it contains primary school, shop, public house (recently fire-destroyed but to be rebuilt), has recently benefited from the construction of a second group of affordable housing and, vitally and unusually, contains three major employers. It also benefits from a bus service into Diss; thus needs its services protected. The fact that this has not been recognised raises the question of the designation criteria applied, their accuracy, whether there has been adequate research and fact finding, and thus whether they form a sound and reliable base for village planning strategy. The consequences of this categorisation has certainly not been understood or properly explained to the inhabitants of Bressingham, and probably not to any of the village communities so affected. Community Involvement⁹. The difficulty with the Joint Core Strategy is that it is so clearly fixated on Norwich and its problems and potential that all other aspects of the County are deemed to be bound to support the County capital city's future with little regard to other factors. It would be perfectly possible to accept that the strategy is a reasonable and supportable solution to planning issues based solely within the Norwich Policy Area. It will be claimed that the Joint Core Strategy is not meant to control the planning of areas outside the Norwich hinterland, which will become the subject of other documents. But the Strategy does cover Diss and its hinterland, does set housing targets, does restrict and manipulate village growth and clearly sets a background template to which any subsequent or existing plan must conform.¹⁰ The impact of the Strategy may well have been the subject of consultation with the policies for the inner Norwich Policy Area dominating and taking the limelight; but the lack of policy for the outer areas and the villages have certainly not been explained or justified and there has been little or no evidence of participation of and support from those living in these areas, either from the designated Market Towns or Villages. To consent to this Joint Core Strategy as published is to accept the lack of any creative and attractive planning policies for those areas unfortunate not to be closely entwined with Norwich and, as usual, Diss and its region falls into this category and dilemma. Conclusion¹¹. It is my opinion that, before this document achieves the status of a statutory instrument, it should satisfactorily deal with and resolve the planning issues of the South Norfolk boundary areas that it currently ignores, otherwise its soundness, factual base and public acceptance will be in doubt.

Joint Core Strategy Proposed submission Document

S - 11341 - 8571 - Policy 15: Service villages - None

11341 Support

CHAPTER 6 Policy 15: Service villages

Respondent: The Duke of Grafton [8571]

Agent: N/A

Full Text:

Summary:

I wish to support the identification of the The Bedingham Estate in the JCS Service Villages Policy (policy 15). I can confirm that the site promoted at Chapel Road in Woodton is suitable and available for development and capable of contributing to the policy's requirement to accommodate at least 10-20 dwellings in the village. Bidwells have said that in South Norfolk, the Council has recently changed its strategy of focussing growth at a smaller number of settlements and instead has proposed a policy of reducing strategic levels of growth at key settlements such as Hethersett and Wymondham and spreading a significant proportion of it across the more rural parts of the district in defined services villages. Woodton is now identified as a service village under the above policy. Therefore the proposed Joint Core Strategy suggests a development of around 10-20 dwellings could be permitted in this location.

Joint Core Strategy Proposed submission Document

O - 11342 - 8570 - Policy 15: Service villages - i

11342 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 15 fails the 'Justified' soundness tests, because it does not reflect the most appropriate strategy when considered against the alternatives. Reasons: Policy 15 currently fails to specifically mention Hethersett in the hierarchy. Hethersett, has a limited range of facilities that together serve the local community and warrants some mention in the hierarchy. The Policy should seek to encourage more facilities at Hethersett to support existing and new growth. It is assumed that Hethersett is included within category 4, "new and enhanced local centres serving major growth locations". However, this category is shown at the bottom of the hierarchy. Hethersett Land Ltd contends that once developed, the facilities that would come forward within category 4 would have the same function as those in category 3. There is therefore no reason why 4 should be considered lower down in the hierarchy. Hethersett Land Ltd suggest that categories 3 and 4 should be merged into 1 category.

Joint Core Strategy Proposed submission Document

S - 11349 - 8216 - Policy 15: Service villages - None

11349 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Paul Dunthorne [8216]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary:

SITE SPECIFIC REPPaul Dunthorne supports the inclusion of Rackheath in the JCS Service Villages Policy (policy 15). Paul Dunthorne also supports the Policy's intent to allow a higher level of growth at Service Villages in the Norwich Policy Area (NPA). Paul Dunthorne contends that it is important for the JCS to acknowledge that Rackheath village is capable of accommodating both strategic growth at the eco-community, as well as 'non-strategic' growth at other sites in the village, including at Green Lane West. Paul Dunthorne notes that the JCS Service Villages Policy (15) intends at least 10-20 houses to be allocated at each servcie village, and in the case of those villages in the Norwich Policy Area, including Rackheath that a higher housing numbers may be allocated. However Paul Dunthorne is concerned that the 'criteria' for dtermining whether Rackheath will have more than just 'small scale growth' is too limiting. This is the subject of spearate representation to JCS paragraph 6.58 and 6.59. Paul Dunthorne can confirm that the site promoted at Green Lane West in Rackheath is suitable and available for development and capable of contributing to the policy's requirement to accommodate new housing growth in the village. Paul Dunthorne confirms that the site at Green Lane West can be developed speparately from the more strategic ec0-community proposals. It is available for immediate development, has its own access to the main road, is in single ownership and has its own established boundaries. Its development would help to support and underpin the existing Rackheath services in the perid before the strategic eco-community begins to deliver sustantial numbers of new housing.

Joint Core Strategy Proposed submission Document

O - 11354 - 8216 - Policy 15: Service villages - i, ii

11354 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Paul Dunthorne [8216]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary:

Whilst Paul Dunthorne supports the inclusion of Rackheath in the JCS service village (policy 15) Paul Dunthorne objects to the supporting text paragraphs 6.58-6.59 which suggests that non-strategic' housing growth beyond 10 to 20 homes will only take place at Rackheath if there is a shortfall in housing numbers elsewhere. Paul Dunthorne contends that this approach to non-strategic' growth at Rackheath is too limiting and does not take into account Rackheath's special planning circumstances and restricts the potential growth to contribute to meeting rackheath's local housing need, particularly in the short term before the proposed eco-community begins delivering substantial numbers of new housing .Paul Dunthorne contends that it is correct for the JCS to acknowledge that Rackheath village is capable of accommodating both strategic growth at the eco-community (former airfield) as well as smaller scale 'non'strategic'growth elsewhere in teh village.Paul Dunthorne notes that the JCS services villages policy (15) intends that at least 10-20 houses are to be allocated at each servcie village, and in the case of thsoe villages in the NPA including Rackheath that a higher housing numbers may be allocated in certain circumstances. Paul Dunthorne interprets this element of the JCS to be relevant to non-strategic' growth at Rackheath i.e. growth proposed separately from the eco-community. However, it is not totally clear in the policy's reasoned justification whtehr this is the JCS's intention and is an omission that could be clarified with a non-substantive change to the policy's reasoned justification.On the basis that policy 15 applies to 'non-strategic' growth at Rackheath i.e. growth that is not part of the eco-community proposals, Paul Dunthorne objects to the suggestion in the Polciy's supporting text (para 6.58 -6.59) that additional non-strategic growth above 20 dwellings in service villages, including Rackheath will only be considered appropriate in the case where there is a shortfall in overall housing numbers elsewhere, presumably in the Norwich Policy Area.Paul Dunthorne considers that this approach to be unsound and that the JCS paras 6.58 - 6.59 fails the JUSTIFIED soundness test and the EFFECTIVE soundness test.The Justified soundness test cannot be met because the apprioch is not based on robust and credible evidence. ther is no evidence demonstrating why 20 homes is considered to be an appropriate limit of development at rackheath, in the event that tehre is sufficient housing elsewhere at other locations.Paul Dunthorne contends that the approach of setting arbitrary restriction on non-stategie housing growth in Rackheath of up to 20 homes (unless there is a shortfall elsewhere) does not take into account:Rackheath's special planning status in the JCS (i.e. the villages inclusion in the NE Norwich Growth triangle); The potential to contribute fully to meeting the needs of the local community, particularly in the period before the eco-community delivers substantial numbrners of new housing; orThe ability of Rackheath to accommodate growth beyond this level.Paul Dunthorne also suggests that the approach also fails the JUSTIFIED soundness test because the approach has resulted in an inappropriate strategy, when considered against alternatives.Paul Dunthorne suggests that for Rackheath the most appropriate strategy would ahve been to allow fro non-strategic growth beyond 10-20 homes, irrespective of whetehr there is sufficient housing numbers elsewhere, providing it can be demonstrated that Rackheath's growth would contribute to sustainable development.Paul Dunthorne suggest given Rackheath's position in the JCS, specifically its inclusion in NE Norwich Growth Triangle and the potential for an eco-community to be developed on the former airfield, its role in the context of the service village policy is slightly different from other service villages and needs to be considered as such. The village's emerging planning policy status therefore warrants a specific approach in the context of the service village polciy.For Rackheath policy 15 reasoned justification should have stated that as well as strategic growth at the eco-community, there is potential for further non strategic growth at the village beyond 20 houses.Paul Dunthorne suggests that teh upper limit of growth at Rackheath should be based on;meeting the needs of local people, improving and supporting local servcies and the ability of the settlement to accommodate growth.Paul Dunthorne contends that the apporach fails the JUSTIFIED soundness test because the approach is insufficiently flexible to take account of unexpected changes in circumstances. For instance, the flexibility to accommodate more that 20 dwellings at rackheath is only triggered if there is a shortage of housing elsewhere, but fro no otehr reason. The policy should be flexible to respond to local housing need and the ability of sites to accommodate more than 20 homes.

Joint Core Strategy Proposed submission Document

S - 11357 - 8351 - Policy 15: Service villages - None

11357 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Messrs P & A Jackson [8351]

Agent: Durrants (Mr Richard Prentice) [4107]

Full Text:

Summary: I wish to support the identification of Carleton Rode in the JCS Service Villages Policy (Policy 15). I can confirm that the site promoted at Flaxlands Road in Carleton Rode is suitable and available for development and capable of contributing to the policy's requirement to accommodate at least 10-20 dwellings in the village.

Joint Core Strategy Proposed submission Document

S - 11366 - 8574 - Policy 15: Service villages - None

11366 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Paul Rogers [8574]

Agent: Bidwells Norwich (309) (Mr Rob Snowling) [8381]

Full Text:

Summary:

SITE SPECIFIC REPPolicy 15 of the proposed submission JCS identifies Horsford as a 'service village' within the NPA and states that land will be allocated within each service village for small-scale housing development subject to form and character considerations. However, it also states that service villages within the NPA may be considered for additional development to help deliver the 'smaller sites' in the NPA allowance identified under proposed submission Policy 9 - strategy for growth in the NPA. We support the distinction between service villages within the NPA and those elsewhere within Broadland and South Norfolk and consider that it is wholly appropriate for service villages within the NPA to be allocated higher levels of growth than service villages outside the NPA. This approach is supported by the East of England Plan, which requires the majority of new development to be allocated within the NPA, therefore we consider that the identification of Horsford as a service village where additional growth will be considered is consistent with adopted regional planning policy guidance contained within the East of England Plan. Para 6.57 of the JCS identifies the services and facilities that are considered to be the most important for a settlement for a service village; a primary school, a food shop, a journey to work public transport and a village hall. Horsford is located on the frequent First Eastern 26/27 bus service, which provides twice hourly service into Norwich with a journey time of less than 30 mins, it has a range of local shops and facilities on Holt Road, an infant and junior school and Horsford medical centre. We therefore consider the identification of Horsford as a service village is founded on a robust and credible evidence base and can be considered justifiable. Bidwells have been retained by Mr Paul Rogers to promote land at Sharps Hall Farm West, a triangular piece of land at the northeast end of Horsford for housing growth. The land at Mill lane is adjacent to the All Saints Middle school and within easy distance of local shops. The land is available for future phased housing growth and this demonstrates the effectiveness of proposed policy 15. We also consider that the phased release of housing at Sharps Farm over the JCS plan period and beyond is capable of bringing about improvements to the existing bus services and therefore justifies service provision.

Joint Core Strategy Proposed submission Document

O - 11378 - 8627 - Policy 15: Service villages - i, ii

11378 Object

CHAPTER 6 Policy 15: Service villages

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: Whilst we support this policy, "small scale" requires more precise definition. Objection 2: We object and can find no justification in the sustainability appraisal for 1000 units at Easton. Whilst we support the provision made for additional growth at those Service Villages which also fall within the NPA because it will enhance the deliverability of the overall housing target for the NPA, we would argue that "small scale" needs a more precise definition in relation to scale and the facility base of villages.

Joint Core Strategy Proposed submission Document

S - 11392 - 8575 - Policy 15: Service villages - None

11392 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Messers H J Spratt [8575]

Agent: N/A

Full Text:

Summary: I wish to support the identification of Tacolneston in the JCS Service Village Policy (Policy 15).I can confirm that the site promoted at Lakes farm in Tacolneston is suitable and available for development and capable of contributing to the policy's requirement to accommodate at least 10-20 dwellings in the village.

Joint Core Strategy Proposed submission Document

S - 11395 - 6920 - Policy 15: Service villages - None

11395 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Nethergate Farms [6920]

Agent: Andrew Pym Chartered Surveyor (Mr. Andrew Pym)
[6919]

Full Text:

Summary:

This rep is made to support policy 15 & the accompanying text. Recognition of dickleburgh as a Service Village is welcomed, as is the proposal to allocate 10-20 dwellings in such settlements, subject to individual appraisals. Further, we welcome the recognition that more housing may approved where there is an opportunity to sustain or improve services, and/or to build on an appropriate exceptions sites where there is justification for additional development. Land at Chapel Farm provides an opportunity now to meet an identified need for 20 dwellings. Its location close to thwe centre of the village and its facilities will improve the sustainability of the community

Joint Core Strategy Proposed submission Document

S - 11401 - 8172 - Policy 15: Service villages - None

11401 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Ingleton Wood LLP (Nicole La Ronde) [8172]

Agent: N/A

Full Text:

Summary: Policy 15 Paragraph 6.58 Dickleburgh

Joint Core Strategy Proposed submission Document

S - 11433 - 8222 - Policy 15: Service villages - None

11433 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Gladedale (Anglia) Ltd [8222]

Agent: RPS (Cambs office) (Ms Kathryn Money) [7662]

Full Text:

Summary:

The strategy is supported in principle, in relation to Hempnall in particular, as it provides the opportunity for small-scale housing development in this settlement (10 to 20 dwellings but with flexibility to increase this number to improve local services and sustainability). A strategy that spreads new housing development in a larger number of smaller developments and at 'Service Villages' carries less risk of delay and can make better use of existing infrastructure. Gladedale (Anglia) Ltd have an interest in a 1.3 hectare size site at the southeastern edge of Hempnall, immediately east of Roland Drive. This site offers the opportunity to provide some 39 to 45 dwellings and is immediately to the west of existing residential development. To the east is a playing field with village hall and tennis court. Access into the site is from Bungay Road to the north. RPS is actively promoting this site through the LDF process and it is our client's intention to develop this site at the earliest opportunity. With regards to the suitability of this site (please see attached plan), this site was considered by the Inspector for the South Norfolk Local Plan Inquiry which took place during 1998 and 1999 to be suitable for residential development. However, at the Proposed Modifications stage South Norfolk removed the housing allocation for the site as they considered that sufficient housing land had been provided for. With regards to access into the site this would be via an existing private drive from the B1527 Bungay Road (this access currently serves a residential property located on the site). A Transport Study that has been completed with regards to the future development of this site concludes that there are no inherent accident problems associated with the existing road network within Hempnall. With regards to our client's site it has been concluded that a simple priority junction could be created from the B1527 Bungay Road, with the junction positioned within the site to enable appropriate visibility splays. Footways on the southern side of the Bungay Road could be widened to enhance pedestrian provision and access. In terms of flood risk and drainage issues on the site this has also been investigated. The site is shown outside the indicative flood plain map produced by the Environment Agency and there are no watercourses within the immediate vicinity of the site. Whilst there is a pond situated in the north-east corner of the site there is no obvious outfall. It is therefore considered that there are no significant drainage issues on the site. The development of this site in Hempnall could be assimilated well with the existing settlement and built development. Although Policy 15 states that Hempnall will be allocated small-scale housing growth, which is strongly supported in principle and welcomed, a slightly higher level of development in Hempnall would support the existing services and facilities in the village and improve sustainability.

Joint Core Strategy Proposed submission Document

S - 11438 - 8583 - Policy 15: Service villages - None

11438 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mrs Fae Whalley [8583]

Agent: N/A

Full Text:

Summary: I wish to support the identification of Ditchingham in the JCS Service Villages Policy 15I can confirm that the site promoted at Loddon road in Ditchingham is suitable and available for development and capable of contributing to the policy's requirement to accommodate at least 10-20 dwellings in the village

Joint Core Strategy Proposed submission Document

S - 11463 - 8209 - Policy 15: Service villages - None

11463 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Timewell [8209]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary: Timewell Properties Ltd supports the inclusion of Little Melton in the JCS Service Villages policy (policy 15). Timewell Properties Ltd supports JCS's acknowledgement that Little Melton has a positive role in accommodating growth. Timewell Properties Ltd contends that this approach will enable a continual supply of new homes in the Little Melton area in the period before major growth locations at Hethersett and Cringleford/Colney begin to deliver new housing. Timewell Properties Ltd suggests that the promoted site at Gibbs Close, is a suitable location for accommodating around 60 homes.

Joint Core Strategy Proposed submission Document

O - 11478 - 8209 - Policy 15: Service villages - i, ii

11478 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Timewell [8209]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary:

Whilst Timewell Properties Ltd supports the inclusion of Little Melton in the JCS Service villages policy 15 it objects to the supporting text in paragraphs 6.58-6.59 which suggests that housing growth beyond 10-20 homes will only take place at Little Melton if there is a shortfall in housing numbers elsewhere. Timewell Properties Ltd contends that this approach to growth in Little Melton is too limiting and does not take into account the need for growth in the Little Melton area to contribute to meeting Little Melton's and the surrounding area's local housing need, particularly in the short term before the proposed strategic growth at Hethersett and Colney/Cringleford begins to deliver numbers of new homes. Timewell accepts that Little Melton is not identified as a strategic growth location (i.e. 1000 homes plus), however is suggesting that it is capable of accommodating 'non-strategic' growth for more than 10-20 homes within existing environmental and infrastructure capacity limits. Therefore its sustainable growth should not be artificially limited on the basis of delivery of homes elsewhere. Timewell Properties considers that the JCS paragraphs 6.58-6.59 fails the JUSTIFIED soundness test and the EFFECTIVE soundness test. Timewell suggests that the JUSTIFIED soundness test cannot be met, because it is not based on robust and credible evidence. For instance there is no evidence demonstrating why 20 homes is considered to be an appropriate limit of development at Little Melton. It is an arbitrary figure not based on any evidence of Little Melton's ability to accommodate sustainable growth. Timewell suggests that the approach also fails the JUSTIFIED soundness test because the approach has resulted in an inappropriate strategy when considered against alternatives. Timewell contends that the approach of setting an arbitrary limit on 'non-strategic' housing growth in Little Melton of 10-20 homes, unless there is a shortage of housing elsewhere does not take into account: The potential for Little Melton to contribute to meeting the needs of the local community, particularly in the period before the strategic growth proposals at Hethersett and Cringleford/Colney delivers substantial numbers of new housing; or The ability of Little Melton to accommodate growth beyond this level. The need to underpin existing services and facilities, particularly in the period before the strategic growth proposals at Hethersett and Cringleford/Colney delivers substantial numbers of new housing. Timewell suggests for Little Melton the most appropriate strategy would have been to allow for 'non-strategic' growth beyond 10-20 homes, irrespective of whether there is sufficient housing numbers elsewhere, providing it can be demonstrated that Little Melton's growth would contribute to sustainable development. Timewell accepts that the JCS does not identify Little Melton as a 'strategic' growth location, but considers it is capable of accommodating more than 10-20 homes, and still meet sustainability objectives, particularly given the proximity to existing and new jobs and services. Timewell suggests that given Little Melton's proximity to new job growth at the Norwich Research Park (NRP) its role in the context of the Service Village Policy is very different from other Service Villages and needs to be considered as such. Timewell also contends that the approach fails the EFFECTIVE soundness test because the approach is insufficiently flexible to take account of unexpected changes in circumstances. For instance the flexibility to accommodate more than 20 dwellings at Little Melton is only triggered if there is a shortage of housing elsewhere, but for no other reason. The policy should be flexible enough to respond to local housing need and the ability of settlements to accommodate sustainable development. Land at Gibbs Close is available and deliverable for approx 60 homes.

Joint Core Strategy Proposed submission Document

S - 11541 - 8321 - Policy 15: Service villages - None

11541 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Gerald Barnes [8321]

Agent: N/A

Full Text:

Summary:

I wish to support the identification of Tasburgh in the JCS Service Villages Policy (Policy 15). I can confirm that the site promoted at Low Road in Tasburgh is suitable and available for development and capable of contributing to the policy's requirement to accommodate at least 10-20 dwellings in the village. I note that for settlements in the NPA, the housing requirement may be bigger, and I can confirm that the site promoted at Low Road, Tasburgh is capable of accommodating up to 11 dwellings (@30dph), or a lesser figure in light of characteristics of the immediate area (typically road frontage detached housing).

Joint Core Strategy Proposed submission Document

O - 11547 - 8210 - Policy 15: Service villages - i, ii

11547 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Crane and Son (Farms) Ltd [8210]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary:

Refers to Policy 15 (&16)SummaryCrane & Son (Farms) Ltd contends that the JCS Policy 15 is unsound. It fails the Justified and Effective soundness tests, because it can be demonstrated with evidence that: * It is not based on a robust and credible evidence * It is not the most appropriate strategy when considered against the alternatives * The policy is internally inconsistent* It is not flexible enough to deal with changing circumstancesThe evidence suggests that the village of Marsham, in Broadland district should be identified in the JCS as a "Service Village" and considered a suitable location to accommodate growth, rather than its current designation an "Other village", where the opportunity for growth is more restrictive.Main RepresentationCrane & Son (Farms) Ltd contends that the JCS Policy 15 is unsound. It fails the Justified and Effective soundness tests, because it can be demonstrated with evidence that:1. The evidence and assumptions underpinning the Policy is not robust and credible.2. The policy is internally inconsistent3. It is not the most appropriate strategy when considered against the alternatives 4. It is not flexible enough to deal with changing circumstances1. Lack of robust and credible evidence and assumptionsThe GNDP's evidence and assumptions underpinning Policy 15 are summarised in the Topic Paper: Settlement Hierarchy (GNDP, Nov 2009). The document explains the derivation of the Settlement Hierarchy, and growth distribution policies including Policies 15 and 16 for Service Villages and Other Villages, and seeks to justify the decisions concerning the identification of settlements within the Settlement Hierarchy. It explains the criteria that were used to determine different settlements position within the Hierarchy at the different stages of the JCS's evolution.Page 13 of the Settlement Hierarchy Topic Paper explains that for the Issues and Options versions of the JCS, the definition of a Service Village was a settlement with four essential services (journey to work public transport, community hall, food shop/farm shop, and a primary school). Until the publication of the Pre-Submission Version of the JCS, there were 28 settlements included this criteria, including Marsham. These settlements were considered suitable for accommodating modest housing and employment growth. The minimum level of housing was 10-20 dwellings. Importantly, the rationale for growth was that it would help to sustain and maintain services at a particular village.Crane and Son (Farms) Ltd made representations in respect of the JCS Issues and Options documents. These representations requested(inter alia): * a more flexible approach to accommodating growth;* a recognition that certain Broadland settlements outside of the Norwich Policy Area should be recognised as providing the pot entail for accommodating growth;* that the level of growth to be accommodated at a settlement should be appropriate to its size, role and function in order that they maintain their important role of service centres serving rural communitiesThe representations also highlighted Marsham's existing good range of day to day services and facilities and the role that new development at Marsham would have in underpinning existing services and facilities, including the local primary school and also help to address social inclusion issues, through improved availability of more suitable housing of different mix and tenures and access to new job opportunities.2. Internally inconsistenciesPage 18 of the Settlement Hierarchy Topic Paper explains how the representations made in response to the JCS Issues and Options documents and the views of Members were taken into account in deciding the final criteria for determining "Service Villages", for inclusion in the Pre-Submission Version of the JCS. The result was a change in the criteria, to a more 'relaxed' requirement for services. There is no longer a need for Service Villages to have all four important services, providing they had good access to them or other services. The result was that a further 30 Service Villages, on top of the original 28 Service Villages have been indentified, predominantly in South Norfolk. Surprisingly, given the nature of many of the of new Service Villages, it also resulted in Marsham's relegation into the Other Services category. The only apparent reason for this is because of the loss of its food shop. However, it is apparent that there are settlements in South Norfolk, with the same or a lesser number of services that at Marsham, yet they appear higher up in the Settlement Hierarchy. This is a clear inconsistency in the Policy.The Settlement Hierarchy Topic Paper attempts to explain the difference in approach. It suggests that the reason for the different approach to Service Village definition in Broadland compared to South Norfolk is that, the South Norfolk villages are more self sufficient and not reliant upon Norwich. The Topic Paper suggests that the evidence underpinning this assumption is contained in the Strategic Housing Market Assessment conclusions. However, Crane & Son (Farms) Ltd notes that the Strategic Housing Market Assessment (Paragraphs 1.4.13 - 1.4.16) suggests that it is only the Diss, the Beccles/Bungay and to a lesser extent Harleston Housing Market Areas that are self contained and that the other South Norfolk Market Areas (Wymondham, (parts of) the Broads and Long Stratton) are far more reliant on Norwich. Therefore, there are 3 Housing Market Areas in South Norfolk that are in the same category as the 3 housing Market Areas in Broadland. In fact a significant number, if not the majority of 'new' South Norfolk Service Villages within the defined Housing Market Areas, are actually reliant on Norwich .It is therefore questionable that the assumption justifying the different approaches to Service Village definition in South Norfolk compared to Broadland holds true. It can be demonstrated there are a significant number of "new" Service Villages in South Norfolk that are as reliant on Norwich as there are in Broadland. This is a flaw in the Policy's reasoning. This is highlighted by the fact that there are a number of South Norfolk "Service Villages", in the Market Areas reliant on Norwich (as confirmed in the Strategic Housing Market Assessment) with reportedly the same or less services than Marsham, however, they appear in a higher category. Marsham is defined lower down in the Hierarchy as an "Other Village". As an example of this, Ashwellthorpe in South Norfolk has (according to the topic paper) 6 services, including just 2 important services. Like Marsham, it is in a Market Area that is reliant upon Norwich, yet it is defined as a Service Village and therefore more capable of accommodating growth. Marsham has the same if not more services, including more important services than Ashwellthorpe, yet is deemed less suitable for accommodating growth.Crane & Son (Farms) Ltd therefore contends that this evidence demonstrates that the assumption underpinning the Policy 15 is neither robust, nor credible. This

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has resulted in an unjustified inconsistency in the definition of Service Villages. This constitutes a failure against the Justified Soundness Test. Further to this Crane and Son (Farms) Ltd suggest that the evidence related to Marsham is inaccurate and not robust and that this also constitutes a further failure against the Justified Soundness Test. The Settlement Hierarchy Topic Paper, Appendix Four, (table 1: "Other Villages"), describes Marsham as having a total of 6 services, 3 of which are considered to be "important services". The only missing important service is a food shop. As explained previously, the food shop recently closed. In reality, Marsham has actually got more than 6 of the core services described in Table 1 of the main text of Topic Paper (page 17). It has a primary school (Marsham Primary School), village hall (High Street), pub (Plough Inn), outdoor recreation (the adjacent Countryside and at Top Farm), community groups (parish council), church (All Saints), employment/business opportunities (including Anglian Frames), journey to work public transport, and journey to leisure public transport (i.e. Sanders Coaches: Services 43 and 44, with 20 pick up/drop offs everyday Mon-Sat 8.29am-18.56pm). This is a total of 9 services. Also, the town of Aylsham is only about 2 miles to the north and is accessible by public transport. Aylsham has a good selection of shops, 3 supermarkets, doctor's surgeries, schools for children of all ages (except 6th form) and all the other amenities one would expect to find in a thriving community. Crane & Son (Farms) Ltd suggest that given the range of service, Marsham has, and the proximity to other services at Aylsham, that the loss of Marsham's food shop does not warrant its demotion to an "other village". In Crane & Son (Farms) Ltd opinion, Marsham has not suddenly become an unsustainable village, just because there is no food shop in the village. There are other ways of families obtaining food, for instance, superstores deliver to Marsham and there are 3 supermarkets less than 2 miles away. 3. Inappropriate strategy when considered against the alternatives The lack of robust and credible evidence and flawed assumptions has led the GNDDP to not propose the most appropriate strategy when considered against the alternatives. The most appropriate strategy would have been to include Marsham in the Service Villages Policy. This constitutes a further failure against the Justified Soundness Test. Crane & Son (Farms) Ltd consider it important for the JCS to include Marsham as a service village, in order that it can be considered a suitable location to accommodate growth. Marsham needs growth in order to underpin the existing services and facilities and help address social inclusion issues, through improved access, to more suitable housing and job opportunities and importantly ensure the local schools viability. Crane & Son (Farms) Ltd suggests that Marsham has a range of day-to-day services and facilities including a primary school, public house and bus services serving a local populace within and beyond the village limits and therefore warrants a Service Village designation. The village's location on the A140, the principal road north of Norwich and the main link between the City and the North Norfolk Area also supports its identification as a location for growth. It has good access, including public transport links to Aylsham, Cromer and southwards to the Norwich. Crane & Son (Farms) Ltd therefore consider it right and proper that the village is allowed to grow to meet the housing and employment needs of the local area and further underpin existing services and facilities and potentially attract new ones. Crane and Son (Farms) Ltd suggest that relegating Marsham to a "other village", thereby limiting the opportunity for growth would have a detrimental affect on the ability of Marsham to maintain its role as a service centre and weaken its ability to offer a range of services and facilities and locations to meet the housing needs of local people. Crane & Son Farms (Ltd) suggest that it is common sense that shops, services and facilities need people to use them in order that they survive and prosper, otherwise they will disappear. Once they have gone, it is very unlikely they will return, particularly as people tend to get used to travelling to access services and facilities. The loss of Marsham's existing services and facilities, particularly the school will inevitably lead to the village becoming less sustainable, because people there will need to travel to get to the next nearest services facilities, probably at Aylsham. This is an inherently unsustainable lifestyle trend, particularly when the main mode of travel will be the car.

Of particular concern to local people, is the ability of the primary school to remain viable. Whilst the school roll has stabilised, there is still capacity for more pupils. The concern is that in the future the lack of family homes in Marsham will eventually result in less primary school aged children in the village, which could lead to its closure. Also, Marsham has pockets of vulnerable groups experiencing particular deprivation issues. A loss of local services will have a severe impact on the quality of life of these groups. The Deprivation in Rural Norfolk Study (OCSI, Dec 2006) commissioned by the Norfolk Community Council indicates that there are some extremely deprived areas in Marsham with over 40% of the population living in areas identified as amongst the most deprived 20% in the region. The Norfolk Rural Community Council report on Deprivation in Rural Norfolk (OCSI, Dec 2006) provides evidence of the social inclusion issues facing Marsham. The report is attached to this representation. The GNDDP's evidence in the Greater Norwich Housing Market Assessment (HMA) acknowledges the need for 3-4 bedroom family homes for sale and rent in the Broadland area, to provide a better balance of homes. Interestingly, the HMA suggests that the housing supply in Aylsham will continue at current rates, yet the emerging Core Strategy puts a brake on development there, which points to a greater role for outlying villages, such as Marsham to provide for an ongoing supply of homes. Crane & Son (Farms) Ltd accept that history shows that new housing has not always guaranteed the ongoing viability of local services and facilities. However, the future may be somewhat different, particularly with the increasing costs of travel. People may be less willing to travel where services and facilities are locally available. Therefore, it must make sense to ensure that where villages already have a basic level of services, that all efforts are made to seek to secure the ongoing viability of services and facilities for the longer term, for the benefit of existing and future residents. One way of doing this, is to provide a flexible planning framework to allow for sustainable growth. 4. Flexibility Crane & Son (Farms) Ltd contends that the JCS lacks the flexibility to take into account changing circumstances. For instance, because Marsham has lost its food shop, it has been unjustly relegated out of the "Service Villages" category in the Settlement Hierarchy, into the "Other Villages" category, thereby artificially limiting the opportunity for the village to be considered a suitable place to accommodate sustainable growth. However, the policy has not recognised the continually changing patterns of food shopping. It is now a fact that for many people, a weekly supermarket shop is the norm and for most people it is done by the motor car. For Marsham, there are nearby supermarkets at Aylsham, where this can be done, often as part of a linked trip. Also, Marsham is served by supermarket delivery services. Given the continually changing patterns of food shopping, the loss of the Marsham's local food store does not mean it has

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O - 11547 - 8210 - Policy 15: Service villages - i, ii

11547 Object

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suddenly become an unsustainable location for growth or incapable of accommodating sustainable growth. The JCS has not including any provisions for acknowledging the changing patterns of food shopping, and simply ruled Marsham out as a sustainable growth location on this single factor. Also, the policy does not take into account the possibility that a food store (permanent or mobile) or a farm shop could be established in Marsham during the plan period. This is inherently inflexible. Furthermore, it is clear that only a very few of the current Service Villages have a supermarket, instead many rely on a small food shop. Inevitable, some of these small shops in Service Village's will be lost, due to competition from supermarkets. However, there is no provision for Villages them to be relegated lower in the hierarchy, why should they. It is unlikely that they will be deemed to be no longer sustainable locations for growth. So why has this happened for Marsham? Crane & Son Farms (Ltd) suggest that the JCS should include more flexibility to take account of changing shopping patterns and allow for the sustainable growth of Marsham, responsive to the community's local needs, requirements and capacity of the village to accommodate growth. In particular, the need to help address deprivation and social inclusion issues faced by the village and nearby rural area residents, including support for local services, access to new housing and job opportunities. Conclusion In conclusion, Crane & Son Farms (Ltd) contend that Policy 15 is unsound. It fails the Justified and Effective soundness test, because it can be demonstrated with evidence that: * The evidence and assumptions underpinning the Policy is not robust and credible. * The policy is internally inconsistent * It is not the most appropriate strategy when considered against the alternatives * It is not flexible enough to deal with changing circumstances Crane & Son Farms (Ltd) contend that these flaws have led to Marsham being incorrectly identified as a "other village", when in reality it functions as a "Service Village", serving the local community and surrounding rural area. The JCS should have had a greater recognition of the importance that Marsham would have in accommodating and delivering sustainable growth. Its failure to do so has rendered the JCS unsound. Crane & Son Farms (Ltd) suggest that the JCS should include more flexibility to allow for the sustainable growth of Marsham, responsive to the community's local needs, requirements and capacity of the village to accommodate growth. In particular, the need to help address deprivation and social inclusion issues faced by the village and nearby rural area residents, including support for local services, access to new housing and job opportunities. Crane and Son Farms (Ltd) contend that in Marsham's case there is sufficient capacity in the local infrastructure to accommodate more than 10 to 20 dwellings, and more detailed investigations will be commissioned to determine the actual extent of the extra capacity. Negotiations with other Marsham landowners will also take place to consider opportunities for co-ordinating the village's growth, through a comprehensive village growth masterplan. Crane & Son Farms (Ltd) contends that in Marsham's case, limiting growth will impact on the village's viability and vitality. It impacts on the ability to sustain existing services and facilities and does not properly reflect the area's housing needs. It also limits the opportunity for the village become a more mixed and balanced community and by restricting opportunities to help address Marsham's identified rural deprivation problems. Crane & Son Farms (Ltd) suggest that new development at Marsham will have an important role in underpinning existing services and facilities and helping to address social inclusion issues, through improving access to more suitable housing and job opportunities.

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O - 11614 - 1808 - Policy 15: Service villages - None

11614 Object

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Respondent: Horsford Parish Council (Mr J Graves) [1808]

Agent: N/A

Full Text:

Summary: The Council have considered the proposals contained in the document and would comment that whilst small scale development is acceptable as a Service Village, any larger additional development to help support the NPA allowance would not be feasible with the current infrastructure in Horsford, particularly as the villages relies on a single road (Holt Road) for ingress and egress.

Joint Core Strategy Proposed submission Document

S - 11633 - 7523 - Policy 15: Service villages - None

11633 Support

CHAPTER 6 Policy 15: Service villages

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] **Agent:** N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

S - 11693 - 8191 - Policy 15: Service villages - None

11693 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Cemex [8191]

Agent: Drivers Jonas 6951 (Mr Ben Simpson) [8192]

Full Text:

Summary:

Nationally, CEMEX, owns a number of strategic sites, which are either due to, or already ceased being in operational use. In accordance with National Planning Policy, CEMEX are seeking to promote these sites for alternative uses. Within BDC, NCC, CEMEX wishes to promote two sites. The extent of these sites is shown on the attached plans and the addresses below: Kirby Lane, Leet Hill, Kirby Crane, Norfolk Lodge Farm, Bawburgh. Rather than comment on each policy separately, CEMEX considers it useful to highlight the key areas of support that would help meet the objectives for the development of its sites. In reference to the proposed "Settlement Hierarchy" detailed on page 55, CEMEX considers that distributing development evenly across the districts is sustainable. This would accord with Planning Policy Statement 7, paragraph 4. CEMEX supports the inclusion of Kirby Cane as a Service Village and agrees that land should be allocated for small-scale housing and employment development. CEMEX considers that the CEMEX Kirby Cane site could deliver sustainable development which would accord with Policy 15 and help to accommodate a proportion of the districts housing retirement. The southern Kirby Cane site would provide a natural sustainable extension to the existing settlement close to existing facilities and infrastructure, in accordance with National Planning Policy Statement 1 and Planning Policy Statement 7. CEMEX supports Bawburgh's identified location within the "Norwich Policy Area" and as such supports the consideration of "Other Villages" within the NPA for additional development, if necessary, to help deliver the smaller sites in the NPA allowance. The CEMEX Bawburgh site is a Greenfield site situated east of Bawburgh, next to Chapel Break. To the west of the site is the A47. The majority of the southern part of the site is within the Water Recreational Area policy BAW1 of the South Norfolk Local Plan (2007). In addition, the majority of the site falls within Flood Risk Zones 2 and 3. CEMEX therefore urges the Council to consider the sites potential for leisure related uses or for a water sports venue. This would accord with PPG:17 obj ii. Allocating the CEMEX Bawburgh for recreation would also accord with the Core Strategy, Area-wide Policy 1. CEMEX supports the identification of Kirby Cane as a "Service Centre" and request that the Council considers the site at Kirby Cane for residential use given its sustainable location adjacent to existing development. CEMEX supports the identification of Bawburgh as an "Other Village" and its location within the Norwich Policy Area. CEMEX urges the council to consider their site in Bawburgh for leisure related uses or as a future water sports venue due to its current allocation in the 2007 Norfolk Local Plan as being within the Norwich Policy Area and is identified as having the potential to accommodate a small proportion of the NPA housing requirement. The increase in population will therefore require appropriate leisure facilities to accord with PPG17. We trust that the representations above will be taken into account and on behalf of CEMEX we request that we be kept informed of progress with this and future LDF documents and wish to reserve our client's position to submit further representations on subsequent documents.

Joint Core Strategy Proposed submission Document

S - 11699 - 8592 - Policy 15: Service villages - None

11699 Support

CHAPTER 6 Policy 15: Service villages

Respondent: Mr Charles Birch (Trustees of the Trafford Trust Estate) [8592] **Agent:** Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

Spixworth We endorse the comment at page 25 of the PSD that the Main Towns, Key Service Centres and Service Villages. We endorse the intention underpinning the Spatial Vision of the PSD that the vitality of Services Villages "will have been enhanced and their form and character maintained by the development of sustainable, small-scale housing, economic development and other local facilities." In the light of this element of the Spatial Vision, we support the identification of Spixworth as a Service Village at Policy 15 of the Proposed Submission Document. Service Villages have been identified on the basis of the level of services/facilities available. Spixworth is appropriately considered to be a Service Village for the purposes of Policy 15. We recognise that allocations eventually brought forward in the Service Villages will provide small-scale housing growth to meet a range of local needs, including affordable housing. Paragraph 6.58 of the PSD notes that it is envisaged. We are in agreement with the proposition that "20 dwellings may be exceeded where a specific site is identified which can clearly be demonstrated to improve local service provision (or help maintain services under threat)", where such an approach is compatible with the overall strategy. "We endorse Policy 15 which indicates that in each Service Village land will be allocated for small-scale housing development subject to form and character considerations. We particularly support that element of Policy 15 which states that settlements that are situated within the Norwich Policy Area "may be considered for additional development, if necessary, to help deliver the smaller sites in the NPA allowance (see policy 9)". Policy 9 of the PSD states that housing requirements arising in the NPA will be addressed by the identification of new allocations to deliver a minimum of 21,000 dwellings distributed across a number of different locations. One of these is described as "Broadland small sites in the NPA: 2,000 dwellings." Policy 9 of the PSD indicates that allocations to deliver the smaller sites in Broadland will be made in accordance with the settlement hierarchy and local environmental/servicing considerations. Given that context, we have noted that Spixworth is identified in Policy 15 as a settlement within the NPA which may be considered for additional housing, if necessary, to assist in the delivery of the "smaller sites in the NPA" allowance. We support this policy proposition. When the form and character of Spixworth is evaluated "on the ground" land at the eastern edge of the settlement between Crostwick Lane and the B1150 is perceived visually to relate to the existing settlement. However, that area is not included within Spixworth Parish and as a consequence, is not considered to be located physically and formally within the extent of the Norwich Policy Area defined at appendix 4. Our clients consider that the wording of the PSD at the present time is potentially too inflexible to enable an appropriate expansion of Spixworth on its eastern flank to arise merely because the land involved is located marginally beyond the boundary of the NPA. A thorough/detailed analysis of form, character and servicing constraints appropriate at Spixworth may identify an acceptable development opportunity at the eastern edge of the settlement. However, policy 15 could be interpreted in a manner which would prevent such development arising merely because the land concerned is not located within the extent of the NPA which has been defined at appendix 4 on the basis of the parish boundaries. We acknowledge the approach used by the GNDP to define the NPA but our clients are concerned that an unbending interpretation of the wording of Policy 15 relative to the definition of the NPA could prevent an appropriate extension of Spixworth undertaken within the spirit of the wording of Policy 15 of the PSD. An additional sentence with para 6.58 dealing with this situation could overcome those misgivings. Equally, an appropriate reference could be included on the plan at page 79 of the PSD. That plan already mentions centres which include part of adjacent parishes. We have noted the comment at para 6.59 of the PSD that in exceptional circumstances when considering Service Villages located beyond the NPA, "a larger scale of development may be permitted where it would bring local facilities up to the level of those in a Key Service Centre, and is acceptable having regard to other policies in this core strategy, or a relevant subordinate Development Plan Document." Unfortunately this approach does not apply directly to Spixworth as the existing built up area of the village is actually within the NPA. We recognise that it is not possible for the JCS to provide detailed policy coverage for every eventuality but would request, in the particular circumstances of Spixworth, that the Proposed Submission Document is worded in such a manner as to provide a policy framework which would not rule out of contention a potential eastern expansion of Spixworth merely because the land concerned is not within the defined NPA.

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O - 11730 - 8607 - Policy 15: Service villages - i, ii, iii

11730 Object

CHAPTER 6 Policy 15: Service villages

Respondent: Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd [8607] **Agent:** Barton Willmore Planning Partnership (Mr Edward Hanson) [7091]

Full Text: In our view the Evidence Base that underpins the submitted JCS is fundamentally flawed and our position is such that up to 250 dwellings should be allocated at Mulbarton. Presently the settlement is earmarked for between 10 - 20 dwellings as it is classified as a Service Village under Policy 15 of the JCS. We consider this figure is founded on nothing but a simple averaging exercise rather than a considered approach to capacity. The submitted JCS does nothing to explain why the housing figures in Policy 15 have been divided in this way and no reasoned justification for the proposed level of growth within these Service Villages. We believe there should be two levels of Service Village, Minor and Major. The Minor Service Villages have extremely limited services and should not receive any growth, whilst the Major Service Villages such as Mulbarton should receive a much higher allocation. Furthermore the 1,800 dwellings to be allocated to smaller sites in South Norfolk should be taken into consideration, meaning Major Service Villages such as Mulbarton should receive in the region of 250 dwellings.

Summary: The JCS sets out some 'grand challenges' at page 6 of the document and it is these that must be realised through the evolving JCS. By limiting the scale of growth at Mulbarton to 10 - 20 dwellings the JCS does not meet the grand challenges or allow for sufficient flexibility in terms of the housing that could be accommodated. It also omits reference to the fact that the RSS figures are minima, not maxima and furthermore does not reflect the advice of PPS1 which requires development to make the best and most efficient use of land. The focus of this representation is to emphasise the sustainable merits of the particular site in question and why it is considered wholly suitable for residential development in the region of 250 new dwellings, particularly when considered in comparison to the other areas identified for similar scale development. We request that the Inspector takes note of our objection and our client to contribute and comment on the robustness of the JCS at the forthcoming Examination. As requested by the GNDDP, this statement accompanies a Representation Form pertaining to the specific policies we wish to see changed in advance of adoption of the final JCS. Barton Willmore LLP has been appointed to represent Landform Strategic Investments Ltd and Welbeck Strategic Land Ltd ('the Client') who currently has a controlling interest of land to the east of Mulbarton. 1.2 Within these representations we consider the three tests of soundness and look at areas of the JCS where we feel modifications are required in order to make the document fully compliant. Specifically, we seek a change to Policy 15 and explain our justification for our assertion that the proposed levels of housing at Mulbarton should be increased. 1.3 Advice on how to prepare the JCS and what to include is contained in PPS12 and various advice notes from PINS and the PAS documents. In particular, we rely on the following advice: * PINS "Examining Development Plan Documents Soundness Guidance" (Aug 2009, 2nd edition). * PINS "Local Development Frameworks: Examining Development Plan Documents: Learning from Experience" (Sept 2009). * PAS "The Plan Making Manual" (2009). 1.4 The pro-forma sent out by GNDDP entitled "DPD - Publication (Pre-submission) Stage Representation Form", attached a guidance note summarising the grounds for testing the soundness of the JCS. These are essentially legal compliance and content compliance, including whether the DPD is justified, effective and in accordance with national planning policy. 1.5 The purpose of our representations on the JCS is to summarise the areas of support and objection and, where we object, to indicate whether the individual matter is sufficient to find the JCS unsound or whether cumulative objections are sufficient to find the JCS unsound. We provide the reason for objecting and summarise in the conclusions the soundness test the matter appropriately relates to. 1.6 We do not comment on every aspect of the JCS. Our intention is to comment on all sections where we find non-compliance with the tests of soundness. Specifically, 17592/A5/091214 CS Representations 1 our concern in this instance is Policy 15 and the lack of an evidential basis for its content. 1.7 We understand the JCS must, in effect, be an appropriate conclusion of the LD Evidence base and the amount of detail produced in the JCS should be proportionate. The evidence base should inform what is in the plan rather than being collected retrospectively in an attempt to justify the plan. Our objections consider whether the evidence is being produced retrospectively and whether it is absent, flawed or out-of-date in relation to the conclusions drawn in the JCS. 1.8 The spatial vision set out in Section 4 of the JCS sets out a clear distribution strategy for housing and employment and recognises the impacts of development on climate change, the environment, communities and transport. 1.9 We generally support the objectives on pages 24 to 26 but consider Objective 2 must be modified to reflect RSS objectives and policies as follows: Objections to Spatial Objectives Objective 2: To allocate "enough" land for housing. Objection: This must be changed to reflect RSS Policies H1 and H2 to allocate "at least" the targets expressed. It must also make clear that the target to meet is the RSS requirements at 2021 and not as suggested the target to 2026. The 15 year period for housing projections from the approval of the JCS is not the 1.10 We make the case within these representations that there is no rationale for limiting the proposed growth at Mulbarton to 10 to 20 dwellings and emphasise that the RSS dictates that housing requirements set out therein are minima, not maxima. The site east of Mulbarton could be comfortably developed in the immediate future for 250 units and would provide valuable community benefits. 1.11 We provide a brief commentary within Chapter 5 of this statement in relation to other JCS policies. On balance we consider the JCS to be sound but are seeking a modification to the wording of Policy 15 to differentiate between minor and major Service Villages. The JCS identifies under Policy 15 a list of 'Service Villages'. Under this policy, Mulbarton is identified for an allocation of 10 - 20 dwellings. Our client's site is promoted as the most logical and wholly sustainable site for a development of approximately 250 dwellings. The site has adequate capacity to provide for as many dwellings and our position is such that the wording of Policy 15 must be modified to reflect this. 6.2 The site has been masterplanned in a careful and comprehensive manner for 250 units and the proposed development would serve to strengthen existing facilities in the town centre by contributing to its continuing viability and vitality. Taking this into account along with the indisputable sustainability merits of the scheme and the apparent lack of evidence to justify the limited housing numbers of 10 - 20 units, we consider that Policy 15 should be amended accordingly. In our view this would serve to make Policy 15 of the JCS compliant with the objectives of the RSS which is to treat housing requirements as minima, not maxima. If the site can provide a greater number of dwellings without detriment to the

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surrounding area and in an attractive and pleasant way that brings about very beneficial community benefits, then the JCS should allow for greater flexibility to do so. 6.3 No 'significant' new infrastructure would be required in order to develop the site. As noted in this representation, no major difficulties are envisaged in supplying main services to the site and the availability of all the service connections has been determined by the appropriate supplier. 6.4 The site currently comprises an open rectangular field. It is envisaged that access would be gained from a proposed junction off Bluebell Road, with a secondary access off Rectory Lane. The site is located within a very sustainable location in close proximity to a range of facilities and is approximately 15km from Norwich City by car or bus. Regular bus services operate from Mulbarton to Norwich. 6.5 The description of the site along with the Development Framework Plan at Appendix 1 demonstrates that the location of the site is such that development of it would form a natural extension to the existing residential areas adjoining the site. Allocation of the site would present a strong opportunity for new development of high quality design in keeping with the rural character of the locality. 6.6 We emphasise that development of the site would make a significant contribution to sustaining the village of Mulbarton in the longer term. Our view is that without comprehensive development of the site, the vitality of the village is unlikely to be sustained in the longer term - for example, the schools will need pupils to continue operating which in turn requires the presence of a younger population. 6.7 The proposed level of growth of circa 250 dwellings could be fully delivered on the Landform site. We consider that the allocation of just 10 - 20 dwellings is far too conservative for a settlement such as Mulbarton and would expect to see a greater allocation in the region of 250 or more. We are of the view that the wording and content of Policy 15 must be modified to reflect this for the reasons summarised herein. We also suggest two tiers of Service Villages are introduced, Minor and Major. We do not envisage any insurmountable problems in terms of addressing known site constraints and would reiterate that development of the site is a wholly sustainable and logical option for development that would make a significant contribution to the continued vitality of the village.

Joint Core Strategy Proposed submission Document

O - 11160 - 7132 - Policy 16: Other villages - i, ii, iii

11160 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Mr Terry Davies [7132]

Agent: N/A

Full Text:

Summary: Ringland has been excluded from the plan and in consequence we question whether the plan is sound.

Joint Core Strategy Proposed submission Document

S - 11179 - 7620 - Policy 16: Other villages - None

11179 Support

CHAPTER 6 Policy 16: Other villages

Respondent: IE Homes & Property Ltd (Mr Ed Palmieri) [7620] **Agent:** N/A

Full Text: Development must be in sustainable locations and there are sustainable development opportunities in the higher level service village category in locations along A140 such as Tasburgh.

Summary: Development must be in sustainable locations and there are sustainable development opportunities in the higher level service village category in locations along A140 such as Tasburgh.

Joint Core Strategy Proposed submission Document

O - 11207 - 8507 - Policy 16: Other villages - i

11207 Object

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Respondent: Mr R Smith [8507]

Agent: Beacon Planning Ltd (Ms Jenny Page) [7833]

Full Text: Justified: Failure to consider clustering of villages to a wider extent as an effective means of sustainable development. The policy lists those settlements considered to be of a scale that they can only support limited development. However, this listing does not recognise that certain settlements could be clustered and therefore are sustainable locations for development. The GNDP Topic Paper: Settlement Hierarchy highlights that settlements which have 'linking' features and are in close proximity to one another can be considered a group which shares services and functions. The village of Strumpshaw adjoins Lingwood. There is easy access from Strumpshaw via a 1 mile direct route which provides a suitable walk and cycleway. The villages are also linked by a regular bus service which runs to and from Norwich. It would therefore be sensible to cluster Strumpshaw with Lingwood as a Service Village.

Summary: The policy lists settlements considered to be of a scale that can only support limited development. This listing does not recognise that certain settlements could be clustered and therefore be sustainable locations for development. Topic Paper: Settlement Hierarchy highlights that settlements with 'linking' features can be considered a group which shares services and functions. Strumpshaw adjoins Lingwood. There is easy access from Strumpshaw via a 1 mile direct route with suitable footpath and cycleway and the villages are linked by a regular bus service. Strumpshaw should be grouped with Lingwood as a Service Village in Policy 15.

Joint Core Strategy Proposed submission Document

S - 11208 - 8500 - Policy 16: Other villages - None

11208 Support

CHAPTER 6 Policy 16: Other villages

Respondent: Mr Hugh Ivins [8500]

Agent: Mr Hugh Ivins [8500]

Full Text: Strongly support the inclusion of Swainsthorpe under 'Policy 16 Other Villages' to accommodate infill or small groups of dwellings, subject to identifying the development boundary, and form and character considerations. The village is ideally located from Norwich and has capacity for further development.

Summary: Strongly support the inclusion of Swainsthorpe under 'Policy 16 Other Villages' to accommodate infill or small groups of dwellings, subject to identifying the development boundary, and form and character considerations. The village is ideally located from Norwich and has capacity for further development.

Joint Core Strategy Proposed submission Document

O - 11216 - 8526 - Policy 16: Other villages - i, ii, iii

11216 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Denton Parish Council (mrs pauline sandell) [8526] **Agent:** N/A

Full Text:

Greater Norwich Development Partnership Joint Core Strategy (submission document)Denton Council wish to make representations on the soundness of policies 15 (Service Villages) and 16 (Other Villages) as set out in the above document and in particular their application to Denton [currently classed under Policy 16 (Other Villages)]. Our comments are set out in the attached document. Joint Core Strategy submission document and soundness of document with respect to DentonIntroductionIn the recent past (post 1960) considerable bungalow development has been allowed in the centre of Denton. Our experience has been that these tend to attract retired people from outside the village. As in other areas, farms have merged with the result that former farmhouses have become private dwellings and the farm buildings converted to dwellings and again these types of property tend to attract more affluent and predominantly retired people. The village did have a development boundary but this was drawn so tightly around the properties in the centre of the village that it virtually excluded any new development. More recently the development boundary has been removed completely totally precluding any new development other than conversions. The effect of these past and current policies has been to increase the average age of the village population. This has been further exacerbated by the reluctance of people to move away from the village and allow younger people currently resident in the village to remain and younger families from outside to move into the village. It is hoped that a current planning application for 6 affordable houses may go a small way to remedy the above trend. Denton is an extremely vibrant village, as is evidenced by the fact that in 2008 it won the Pride in Norfolk (under 500 population category), became Norfolk's nominee in the national Calor Village of the Year Competition (competing against places up to 5,000 population). Denton then won the East Region (8 counties) in the Calor competition and fell just short of being the National winner. The Calor competition covers such waters as Community, Business, Sustainability and Communications as well as the way the community has adapted to change Only a well rounded community can expect to do well in the Calor competition. In the above circumstances Denton Parish Council considers it to be inappropriate to classify Denton as an "Other Village" under Policy 16. It is the view of Denton Parish Council that limited house (as opposed to bungalow) development of market houses should in future be permitted.Soundness of Criteria to determine status It is apparent from the Submission Document that four criteria have been adopted to determine the future status of the parish (a school, village hall, food shop and on a bus route). In our view this approach is over simplistic. The criteria and their application to Denton require closer scrutiny and other factors taken into account.School: Denton shares a very successful school with Alburgh (Alburgh with Denton Primary School), which currently has approximately 80 pupils. The school is the result of the merging of the two former village schools. Neither Alburgh nor Denton (which are of equal size) could on their own support the school. The school is a shared facility and must be considered as such. The school is located within the Alburgh parish boundary (some distance from the main Alburgh village development) and less than 2km from the centre of Denton. The school requires controlled growth in the two villages (Alburgh and Denton) to provide its pupils of the future and keep it viable.Village Hall: Denton has a thriving Village Hall. The bar is open every Friday night. Meals are available on the last Friday of each month (between 45 and 80 being served). It is the host venue for many of the village organisations (Social Club, WI, Variety Club, Gardening Club, Friendly Club, Art Group and Extend) as well as the many charity and other events, including the Annual Village Supper and Summer Ball. The Hall has been extended twice in recent years and is so successful it now has three marquees to supplement its facilities. A further large extension is planned. The Hall is the hub for many village activities.Bus service: The village has a very good bus service (by rural standards) with two buses a day, six days a week in each direction. The journey to both Harleston and Bungay (both with a comprehensive range of shops and other services) takes just over 15 minutes. The timing of the buses enables one to do ones shopping and catch the next bus back.Food Shop: The fact is that these days people prefer to shop at supermarkets with a very wide range of goods on sale at competitive prices. Denton has easy access to supermarkets in both Harleston and Bungay (7km away), both by public transport and by car. In such circumstances a food shop in the village should be considered more a luxury rather than essential. A mobile grocer and also a mobile freezer man serve the village at regular intervals. There are outlets in the village selling both beef and poultry. Incidentally, Alburgh does not have a food shop.Other Facilities: In addition to the above Denton has a Post Office (open one morning per week), Motor Mechanic, Children's Playground (this council is planning a major upgrading of existing facilities), Playing Field with Cricket Nets). A well supported Parish News magazine is shared with Alburgh, but published from Denton.Activities: In addition to the organisations and activities referred to above under Village Hall, Denton has the Black Hand Cyder Society and a Cricket Club (albeit in its infancy). The two churches (C of E and URC) work together in an ecumenical partnership with a thriving congregation. Dentill (a biannual event) attracts large numbers of people from surrounding villages and further afield.Businesses: There are some 40 small businesses based in Denton employing in the region of 70 people.The facilities and organisations referred to above work together to produce one of the most thriving smaller (under 2,000 population) communities in the eastern counties.Availability of sites for further developmentDenton was (in the post war era up to the 1970's) allowed to develop on an apparently haphazard/linear basis resulting in a sprawling community with many gaps, both small and much larger, in the developed area. There is therefore opportunity for infill development. Saffron Housing has recently applied for planning permission for six houses to the North of the central area of development. Denton Parish Council has strongly supported this development. There is also land in the central part of the village that is undeveloped and could be designated for slightly larger housing as opposed to bungalow development. ConclusionIn conclusion, 1. It is the primary view of Denton Parish Council that Denton should be re-designated as a Service Village (Policy 15) as opposed to an Other Village (Policy 16) in the same way as the neighbouring village of Alburgh. 2. Alternatively, Alburgh and Denton should be treated as linked villages in the same way as a number of other villages (e.g. Aslacton/Great Moulton and Tacolnестon/Fornccett End) and together classified as Service Villages.

Summary:

Four criteria have been adopted to determine the future status of the parish and in our view this approach is over simplistic. The criteria and their application to Denton require closer scrutiny and other factors taken into account.

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Joint Core Strategy Proposed submission Document

O - 11216 - 8526 - Policy 16: Other villages - i, ii, iii

11216 Object

CHAPTER 6 Policy 16: Other villages

Denton shares a very successful school with Alburgh, the Village Hall is thriving and used by many organizations. Denton has a twice daily six days a week bus service, Denton has easy access to supermarkets in Harleston and Bungay, Denton has a one morning per week post office. There are 40 small businesses based in Denton employing approximately 70 people.

Joint Core Strategy Proposed submission Document

O - 11288 - 8558 - Policy 16: Other villages - None

11288 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Great Melton Parish Council (Mr Chris Lacey) [8558] Agent: N/A

Full Text:

Summary:

With reference to the Greater Norwich Development Partnership document dated November 2009, Great Melton Parish Council would like to comment as follows:1.Policy 16 -page 86. Great Melton may benefit from small scale development especially if this assists young people/first time buyers. Large development is considered to be unsuitable for the village as there are no pavements, street lights, sewage and the current electricity supply is insufficient. Some infilling and conversion of old farm buildings is recommended.2. Policy 9 - page 56. Great Melton Parish Councillors are concerned that proposed new housing in Wymondham, Hetherset and Costessey will lead to vehicle "rat running" through the village. Councillors would like to see the introduction of speed limits in the village, the building of cycle paths to Hetherset and a scheduled bus service.

Joint Core Strategy Proposed submission Document

O - 11309 - 4736 - Policy 16: Other villages - i, ii

11309 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Mr Brian Falk [4736]

Agent: N/A

Full Text:

Summary:

7. The character and social life of Norfolk outside towns is defined by villages and hamlets. If these are to survive and benefit from the twelve spatial planning objectives held to be the objective of the core strategy they have to be permitted change and to grow, albeit slowly. For 'Other' and 'Smaller' villages and communities the too tightly defined development boundaries, as currently exist, and are confirmed as strategy policy, is effectively a policy for decay and decline. A more realistic and publicly acceptable future for these small communities of character would offer a more sound planning approach. 8. Just one example of the dangers, difficulties and errors inherent in the defining of villages within the three categories is as they affect my own 'Diss-support' village of Bressingham. This is designated as an 'Other Village', but it better falls into the category of a 'Service Village' as it contains primary school, shop, public house (recently fire-destroyed but to be rebuilt), has recently benefited from the construction of a second group of affordable housing and, vitally and unusually, contains three major employers. It also benefits from a bus service into Diss; thus needs its services protected. The fact that this has not been recognised raises the question of the designation criteria applied, their accuracy, whether there has been adequate research and fact finding, and thus whether they form a sound and reliable base for village planning strategy. The consequences of this categorisation has certainly not been understood or properly explained to the inhabitants of Bressingham, and probably not to any of the village communities so affected. Community Involvement⁹. The difficulty with the Joint Core Strategy is that it is so clearly fixated on Norwich and its problems and potential that all other aspects of the County are deemed to be bound to support the County capital city's future with little regard to other factors. It would be perfectly possible to accept that the strategy is a reasonable and supportable solution to planning issues based solely within the Norwich Policy Area. It will be claimed that the Joint Core Strategy is not meant to control the planning of areas outside the Norwich hinterland, which will become the subject of other documents. But the Strategy does cover Diss and its hinterland, does set housing targets, does restrict and manipulate village growth and clearly sets a background template to which any subsequent or existing plan must conform.¹⁰ The impact of the Strategy may well have been the subject of consultation with the policies for the inner Norwich Policy Area dominating and taking the limelight; but the lack of policy for the outer areas and the villages have certainly not been explained or justified and there has been little or no evidence of participation of and support from those living in these areas, either from the designated Market Towns or Villages. To consent to this Joint Core Strategy as published is to accept the lack of any creative and attractive planning policies for those areas unfortunate not to be closely entwined with Norwich and, as usual, Diss and its region falls into this category and dilemma. Conclusion¹¹. It is my opinion that, before this document achieves the status of a statutory instrument, it should satisfactorily deal with and resolve the planning issues of the South Norfolk boundary areas that it currently ignores, otherwise its soundness, factual base and public acceptance will be in doubt.

Joint Core Strategy Proposed submission Document

O - 11544 - 8600 - Policy 16: Other villages - ii

11544 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Executors of B. Able Deceased [8600]

Agent: G.Durrants and Sons. Ltd (Mr Brian Belton) [7475]

Full Text: Additional letter and Supporting documents received 24 February 2010. Files attached here to this original submission

Summary: Refers to Policy 16, paragraph 6.60 - 6.61 Inconsistency of application or merit in hierarchy of villages. Felthorpe has more facilities and infrastructure than many villages currently noted in Policy 16 and therefore should be included.

Joint Core Strategy Proposed submission Document

O - 11546 - 8601 - Policy 16: Other villages - ii

11546 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Messrs E. A Mayhew & Sons Ltd [8601]

Agent: G.Durrants and Sons. Ltd (Mr Brian Belton) [7475]

Full Text:

Summary: Refers to Policy 16, paragraph 6.60 - 6.61 Inconsistency of application or merit in hierarchy of villages. Woodton has more facilities and infrastructure than many currently noted in Policy 16 and therefore should be included.

Joint Core Strategy Proposed submission Document

O - 11548 - 8210 - Policy 16: Other villages - i, ii

11548 Object

CHAPTER 6 Policy 16: Other villages

Respondent: Crane and Son (Farms) Ltd [8210]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary:

Refers to Policy 16 (&15)SummaryCrane & Son (Farms) Ltd contends that the JCS Policy 16 is unsound. It fails the Justified and Effective soundness tests, because it can be demonstrated with evidence that: * It is not based on a robust and credible evidence * It is not the most appropriate strategy when considered against the alternatives * The policy is internally inconsistent* It is not flexible enough to deal with changing circumstancesThe evidence suggests that the village of Marsham, in Broadland district should be identified in the JCS as a "Service Village" and considered a suitable location to accommodate growth, rather than its current designation an "Other village", where the opportunity for growth is more restrictive.Main RepresentationCrane & Son (Farms) Ltd contends that the JCS Policy 16 is unsound. It fails the Justified and Effective soundness tests, because it can be demonstrated with evidence that:1. The evidence and assumptions underpinning the Policy is not robust and credible.2. The policy is internally inconsistent3. It is not the most appropriate strategy when considered against the alternatives 4. It is not flexible enough to deal with changing circumstances1. Lack of robust and credible evidence and assumptionsThe GNDP's evidence and assumptions underpinning Policy 16 are summarised in the Topic Paper: Settlement Hierarchy (GNDP, Nov 2009). The document explains the derivation of the Settlement Hierarchy, and growth distribution policies including Policies 15 and 16 for Service Villages and Other Villages, and seeks to justify the decisions concerning the identification of settlements within the Settlement Hierarchy. It explains the criteria that were used to determine different settlements position within the Hierarchy at the different stages of the JCS's evolution.Page 13 of the Settlement Hierarchy Topic Paper explains that for the Issues and Options versions of the JCS, the definition of a Service Village was a settlement with four essential services (journey to work public transport, community hall, food shop/farm shop, and a primary school). Until the publication of the Pre-Submission Version of the JCS, there were 28 settlements included this criteria, including Marsham. These settlements were considered suitable for accommodating modest housing and employment growth. The minimum level of housing was 10-20 dwellings. Importantly, the rationale for growth was that it would help to sustain and maintain services at a particular village.Crane and Son (Farms) Ltd made representations in respect of the JCS Issues and Options documents. These representations requested(inter alia): * a more flexible approach to accommodating growth;* a recognition that certain Broadland settlements outside of the Norwich Policy Area should be recognised as providing the pot entail for accommodating growth;* that the level of growth to be accommodated at a settlement should be appropriate to its size, role and function in order that they maintain their important role of service centres serving rural communitiesThe representations also highlighted Marsham's existing good range of day to day services and facilities and the role that new development at Marsham would have in underpinning existing services and facilities, including the local primary school and also help to address social inclusion issues, through improved availability of more suitable housing of different mix and tenures and access to new job opportunities.2. Internally inconsistenciesPage 18 of the Settlement Hierarchy Topic Paper explains how the representations made in response to the JCS Issues and Options documents and the views of Members were taken into account in deciding the final criteria for determining "Service Villages", for inclusion in the Pre-Submission Version of the JCS. The result was a change in the criteria, to a more 'relaxed' requirement for services. There is no longer a need for Service Villages to have all four important services, providing they had good access to them or other services. The result was that a further 30 Service Villages, on top of the original 28 Service Villages have been indentified, predominantly in South Norfolk. Surprisingly, given the nature of many of the of new Service Villages, it also resulted in Marsham's relegation into the Other Services category. The only apparent reason for this is because of the loss of its food shop. However, it is apparent that there are settlements in South Norfolk, with the same or a lesser number of services that at Marsham, yet they appear higher up in the Settlement Hierarchy. This is a clear inconsistency in the Policy.The Settlement Hierarchy Topic Paper attempts to explain the difference in approach. It suggests that the reason for the different approach to Service Village definition in Broadland compared to South Norfolk is that, the South Norfolk villages are more self sufficient and not reliant upon Norwich. The Topic Paper suggests that the evidence underpinning this assumption is contained in the Strategic Housing Market Assessment conclusions. However, Crane & Son (Farms) Ltd notes that the Strategic Housing Market Assessment (Paragraphs 1.4.13 - 1.4.16) suggests that it is only the Diss, the Beccles/Bungay and to a lesser extent Harleston Housing Market Areas that are self contained and that the other South Norfolk Market Areas (Wymondham, (parts of) the Broads and Long Stratton) are far more reliant on Norwich. Therefore, there are 3 Housing Market Areas in South Norfolk that are in the same category as the 3 housing Market Areas in Broadland. In fact a significant number, if not the majority of 'new' South Norfolk Service Villages within the defined Housing Market Areas, are actually reliant on Norwich .It is therefore questionable that the assumption justifying the different approaches to Service Village definition in South Norfolk compared to Broadland holds true. It can be demonstrated there are a significant number of "new" Service Villages in South Norfolk that are as reliant on Norwich as there are in Broadland. This is a flaw in the Policy's reasoning. This is highlighted by the fact that there are a number of South Norfolk "Service Villages", in the Market Areas reliant on Norwich (as confirmed in the Strategic Housing Market Assessment) with reportedly the same or less services than Marsham, however, they appear in a higher category. Marsham is defined lower down in the Hierarchy as an "Other Village". As an example of this, Ashwellthorpe in South Norfolk has (according to the topic paper) 6 services, including just 2 important services. Like Marsham, it is in a Market Area that is reliant upon Norwich, yet it is defined as a Service Village and therefore more capable of accommodating growth. Marsham has the same if not more services, including more important services than Ashwellthorpe, yet is deemed less suitable for accommodating growth.Crane & Son (Farms) Ltd therefore contends that this evidence demonstrates that the assumption underpinning the Policy 16 is neither robust, nor credible. This

Note: The composite reference number in the box at the top of the page is made up of the following information:Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

11548 Object

CHAPTER 6 Policy 16: Other villages

has resulted in an unjustified inconsistency in the definition of Service Villages. This constitutes a failure against the Justified Soundness Test. Further to this Crane and Son (Farms) Ltd suggest that the evidence related to Marsham is inaccurate and not robust and that this also constitutes a further failure against the Justified Soundness Test. The Settlement Hierarchy Topic Paper, Appendix Four, (table 1: "Other Villages"), describes Marsham as having a total of 6 services, 3 of which are considered to be "important services". The only missing important service is a food shop. As explained previously, the food shop recently closed. In reality, Marsham has actually got more than 6 of the core services described in Table 1 of the main text of Topic Paper (page 17). It has a primary school (Marsham Primary School), village hall (High Street), pub (Plough Inn), outdoor recreation (the adjacent Countryside and at Top Farm), community groups (parish council), church (All Saints), employment/business opportunities (including Anglian Frames), journey to work public transport, and journey to leisure public transport (i.e. Sanders Coaches: Services 43 and 44, with 20 pick up/drop offs everyday Mon-Sat 8.29am-18.56pm). This is a total of 9 services. Also, the town of Aylsham is only about 2 miles to the north and is accessible by public transport. Aylsham has a good selection of shops, 3 supermarkets, doctor's surgeries, schools for children of all ages (except 6th form) and all the other amenities one would expect to find in a thriving community. Crane & Son (Farms) Ltd suggest that given the range of service, Marsham has, and the proximity to other services at Aylsham, that the loss of Marsham's food shop does not warrant its demotion to an "other village". In Crane & Son (Farms) Ltd opinion, Marsham has not suddenly become an unsustainable village, just because there is no food shop in the village. There are other ways of families obtaining food, for instance, superstores deliver to Marsham and there are 3 supermarkets less than 2 miles away. 3. Inappropriate strategy when considered against the alternatives The lack of robust and credible evidence and flawed assumptions has led the GNDDP to not propose the most appropriate strategy when considered against the alternatives. The most appropriate strategy would have been to include Marsham in the Service Villages Policy. This constitutes a further failure against the Justified Soundness Test. Crane & Son (Farms) Ltd consider it important for the JCS to include Marsham as a service village, in order that it can be considered a suitable location to accommodate growth. Marsham needs growth in order to underpin the existing services and facilities and help address social inclusion issues, through improved access, to more suitable housing and job opportunities and importantly ensure the local schools viability. Crane & Son (Farms) Ltd suggests that Marsham has a range of day-to-day services and facilities including a primary school, public house and bus services serving a local populace within and beyond the village limits and therefore warrants a Service Village designation. The village's location on the A140, the principal road north of Norwich and the main link between the City and the North Norfolk Area also supports its identification as a location for growth. It has good access, including public transport links to Aylsham, Cromer and southwards to the Norwich. Crane & Son (Farms) Ltd therefore consider it right and proper that the village is allowed to grow to meet the housing and employment needs of the local area and further underpin existing services and facilities and potentially attract new ones. Crane and Son (Farms) Ltd suggest that relegating Marsham to a "other village", thereby limiting the opportunity for growth would have a detrimental affect on the ability of Marsham to maintain its role as a service centre and weaken its ability to offer a range of services and facilities and locations to meet the housing needs of local people. Crane & Son Farms (Ltd) suggest that it is common sense that shops, services and facilities need people to use them in order that they survive and prosper, otherwise they will disappear. Once they have gone, it is very unlikely they will return, particularly as people tend to get used to travelling to access services and facilities. The loss of Marsham's existing services and facilities, particularly the school will inevitably lead to the village becoming less sustainable, because people there will need to travel to get to the next nearest services facilities, probably at Aylsham. This is an inherently unsustainable lifestyle trend, particularly when the main mode of travel will be the car.

Of particular concern to local people, is the ability of the primary school to remain viable. Whilst the school roll has stabilised, there is still capacity for more pupils. The concern is that in the future the lack of family homes in Marsham will eventually result in less primary school aged children in the village, which could lead to its closure. Also, Marsham has pockets of vulnerable groups experiencing particular deprivation issues. A loss of local services will have a severe impact on the quality of life of these groups. The Deprivation in Rural Norfolk Study (OCSI, Dec 2006) commissioned by the Norfolk Community Council indicates that there are some extremely deprived areas in Marsham with over 40% of the population living in areas identified as amongst the most deprived 20% in the region. The Norfolk Rural Community Council report on Deprivation in Rural Norfolk (OCSI, Dec 2006) provides evidence of the social inclusion issues facing Marsham. The report is attached to this representation. The GNDDP's evidence in the Greater Norwich Housing Market Assessment (HMA) acknowledges the need for 3-4 bedroom family homes for sale and rent in the Broadland area, to provide a better balance of homes. Interestingly, the HMA suggests that the housing supply in Aylsham will continue at current rates, yet the emerging Core Strategy puts a brake on development there, which points to a greater role for outlying villages, such as Marsham to provide for an ongoing supply of homes. Crane & Son (Farms) Ltd accept that history shows that new housing has not always guaranteed the ongoing viability of local services and facilities. However, the future may be somewhat different, particularly with the increasing costs of travel. People may be less willing to travel where services and facilities are locally available. Therefore, it must make sense to ensure that where villages already have a basic level of services, that all efforts are made to seek to secure the ongoing viability of services and facilities for the longer term, for the benefit of existing and future residents. One way of doing this, is to provide a flexible planning framework to allow for sustainable growth. 4. Flexibility Crane & Son (Farms) Ltd contends that the JCS lacks the flexibility to take into account changing circumstances. For instance, because Marsham has lost its food shop, it has been unjustly relegated out of the "Service Villages" category in the Settlement Hierarchy, into the "Other Villages" category, thereby artificially limiting the opportunity for the village to be considered a suitable place to accommodate sustainable growth. However, the policy has not recognised the continually changing patterns of food shopping. It is now a fact that for many people, a weekly supermarket shop is the norm and for most people it is done by the motor car. For Marsham, there are nearby supermarkets at Aylsham, where this can be done, often as part of a linked trip. Also, Marsham is served by supermarket delivery services. Given the continually changing patterns of food shopping, the loss of the Marsham's local food store does not mean it has

Joint Core Strategy Proposed submission Document

O - 11548 - 8210 - Policy 16: Other villages - i, ii

11548 Object

CHAPTER 6 Policy 16: Other villages

suddenly become an unsustainable location for growth or incapable of accommodating sustainable growth. The JCS has not including any provisions for acknowledging the changing patterns of food shopping, and simply ruled Marsham out as a sustainable growth location on this single factor. Also, the policy does not take into account the possibility that a food store (permanent or mobile) or a farm shop could be established in Marsham during the plan period. This is inherently inflexible. Furthermore, it is clear that only a very few of the current Service Villages have a supermarket, instead many rely on a small food shop. Inevitable, some of these small shops in Service Village's will be lost, due to competition from supermarkets. However, there is no provision for Villages them to be relegated lower in the hierarchy, why should they. It is unlikely that they will be deemed to be no longer sustainable locations for growth. So why has this happened for Marsham? Crane & Son Farms (Ltd) suggest that the JCS should include more flexibility to take account of changing shopping patterns and allow for the sustainable growth of Marsham, responsive to the community's local needs, requirements and capacity of the village to accommodate growth. In particular, the need to help address deprivation and social inclusion issues faced by the village and nearby rural area residents, including support for local services, access to new housing and job opportunities. Conclusion In conclusion, Crane & Son Farms (Ltd) contend that Policy 16 is unsound. It fails the Justified and Effective soundness test, because it can be demonstrated with evidence that: * The evidence and assumptions underpinning the Policy is not robust and credible. * The policy is internally inconsistent * It is not the most appropriate strategy when considered against the alternatives * It is not flexible enough to deal with changing circumstances Crane & Son Farms (Ltd) contend that these flaws have led to Marsham being incorrectly identified as a "other village", when in reality it functions as a "Service Village", serving the local community and surrounding rural area. The JCS should have had a greater recognition of the importance that Marsham would have in accommodating and delivering sustainable growth. Its failure to do so has rendered the JCS unsound. Crane & Son Farms (Ltd) suggest that the JCS should include more flexibility to allow for the sustainable growth of Marsham, responsive to the community's local needs, requirements and capacity of the village to accommodate growth. In particular, the need to help address deprivation and social inclusion issues faced by the village and nearby rural area residents, including support for local services, access to new housing and job opportunities. Crane and Son Farms (Ltd) contend that in Marsham's case there is sufficient capacity in the local infrastructure to accommodate more than 10 to 20 dwellings, and more detailed investigations will be commissioned to determine the actual extent of the extra capacity. Negotiations with other Marsham landowners will also take place to consider opportunities for co-ordinating the village's growth, through a comprehensive village growth masterplan. Crane & Son Farms (Ltd) contends that in Marsham's case, limiting growth will impact on the village's viability and vitality. It impacts on the ability to sustain existing services and facilities and does not properly reflect the area's housing needs. It also limits the opportunity for the village become a more mixed and balanced community and by restricting opportunities to help address Marsham's identified rural deprivation problems. Crane & Son Farms (Ltd) suggest that new development at Marsham will have an important role in underpinning existing services and facilities and helping to address social inclusion issues, through improving access to more suitable housing and job opportunities.

Joint Core Strategy Proposed submission Document

S - 11634 - 7523 - Policy 16: Other villages - None

11634 Support

CHAPTER 6 Policy 16: Other villages

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

S - 11694 - 8191 - Policy 16: Other villages - None

11694 Support

CHAPTER 6 Policy 16: Other villages

Respondent: Cemex [8191]

Agent: Drivers Jonas 6951 (Mr Ben Simpson) [8192]

Full Text:

Summary:

Nationally, CEMEX, owns a number of strategic sites, which are either due to, or already ceased being in operational use. In accordance with National Planning Policy, CEMEX are seeking to promote these sites for alternative uses. Within BDC, NCC, CEMEX wishes to promote two sites. The extent of these sites is shown on the attached plans and the addresses below: Kirby Lane, Leet Hill, Kirby Crane, Norfolk Lodge Farm, Bawburgh. Rather than comment on each policy separately, CEMEX considers it useful to highlight the key areas of support that would help meet the objectives for the development of its sites. In reference to the proposed "Settlement Hierarchy" detailed on page 55, CEMEX considers that distributing development evenly across the districts is sustainable. This would accord with Planning Policy Statement 7, paragraph 4. CEMEX supports the inclusion of Kirby Cane as a Service Village and agrees that land should be allocated for small-scale housing and employment development. CEMEX considers that the CEMEX Kirby Cane site could deliver sustainable development which would accord with Policy 15 and help to accommodate a proportion of the districts housing retirement. The southern Kirby Cane site would provide a natural sustainable extension to the existing settlement close to existing facilities and infrastructure, in accordance with National Planning Policy Statement 1 and Planning Policy Statement 7. CEMEX supports Bawburgh's identified location within the "Norwich Policy Area" and as such supports the consideration of "Other Villages" within the NPA for additional development, if necessary, to help deliver the smaller sites in the NPA allowance. The CEMEX Bawburgh site is a Greenfield site situated east of Bawburgh, next to Chapel Break. To the west of the site is the A47. The majority of the southern part of the site is within the Water Recreational Area policy BAW1 of the South Norfolk Local Plan (2007). In addition, the majority of the site falls within Flood Risk Zones 2 and 3. CEMEX therefore urges the Council to consider the sites potential for leisure related uses or for a water sports venue. This would accord with PPG:17 obj ii. Allocating the CEMEX Bawburgh for recreation would also accord with the Core Strategy, Area-wide Policy 1. CEMEX supports the identification of Kirby Cane as a "Service Centre" and request that the Council considers the site at Kirby Cane for residential use given its sustainable location adjacent to existing development. CEMEX supports the identification of Bawburgh as an "Other Village" and its location within the Norwich Policy Area. CEMEX urges the council to consider their site in Bawburgh for leisure related uses or as a future water sports venue due to its current allocation in the 2007 Norfolk Local Plan as being within the Norwich Policy Area and is identified as having the potential to accommodate a small proportion of the NPA housing requirement. The increase in population will therefore require appropriate leisure facilities to accord with PPG17. We trust that the representations above will be taken into account and on behalf of CEMEX we request that we be kept informed of progress with this and future LDF documents and wish to reserve our client's position to submit further representations on subsequent documents.

Joint Core Strategy Proposed submission Document

S - 11292 - 8479 - Policy 17: Smaller rural communities and the countryside - None

11292 Support

CHAPTER 6 Policy 17: Smaller rural communities and the countryside

Respondent: Mr Chris Mutten [8479]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary: Policy 17 sets out the circumstances where development will be permitted in the countryside and smaller rural villages not identified within the settlement hierarchy. We support the recognition of affordable housing provision adjacent to villages where local need is identified.

Joint Core Strategy Proposed submission Document

O - 11310 - 4736 - Policy 17: Smaller rural communities and the countryside - i, ii

11310 Object

CHAPTER 6 Policy 17: Smaller rural communities and the countryside

Respondent: Mr Brian Falk [4736]

Agent: N/A

Full Text:

Summary:

7. The character and social life of Norfolk outside towns is defined by villages and hamlets. If these are to survive and benefit from the twelve spatial planning objectives held to be the objective of the core strategy they have to be permitted change and to grow, albeit slowly. For 'Other' and 'Smaller' villages and communities the too tightly defined development boundaries, as currently exist, and are confirmed as strategy policy, is effectively a policy for decay and decline. A more realistic and publicly acceptable future for these small communities of character would offer a more sound planning approach. 8. Just one example of the dangers, difficulties and errors inherent in the defining of villages within the three categories is as they affect my own 'Diss-support' village of Bressingham. This is designated as an 'Other Village', but it better falls into the category of a 'Service Village' as it contains primary school, shop, public house (recently fire-destroyed but to be rebuilt), has recently benefited from the construction of a second group of affordable housing and, vitally and unusually, contains three major employers. It also benefits from a bus service into Diss; thus needs its services protected. The fact that this has not been recognised raises the question of the designation criteria applied, their accuracy, whether there has been adequate research and fact finding, and thus whether they form a sound and reliable base for village planning strategy. The consequences of this categorisation has certainly not been understood or properly explained to the inhabitants of Bressingham, and probably not to any of the village communities so affected. Community Involvement⁹. The difficulty with the Joint Core Strategy is that it is so clearly fixated on Norwich and its problems and potential that all other aspects of the County are deemed to be bound to support the County capital city's future with little regard to other factors. It would be perfectly possible to accept that the strategy is a reasonable and supportable solution to planning issues based solely within the Norwich Policy Area. It will be claimed that the Joint Core Strategy is not meant to control the planning of areas outside the Norwich hinterland, which will become the subject of other documents. But the Strategy does cover Diss and its hinterland, does set housing targets, does restrict and manipulate village growth and clearly sets a background template to which any subsequent or existing plan must conform.¹⁰ The impact of the Strategy may well have been the subject of consultation with the policies for the inner Norwich Policy Area dominating and taking the limelight; but the lack of policy for the outer areas and the villages have certainly not been explained or justified and there has been little or no evidence of participation of and support from those living in these areas, either from the designated Market Towns or Villages. To consent to this Joint Core Strategy as published is to accept the lack of any creative and attractive planning policies for those areas unfortunate not to be closely entwined with Norwich and, as usual, Diss and its region falls into this category and dilemma. Conclusion¹¹. It is my opinion that, before this document achieves the status of a statutory instrument, it should satisfactorily deal with and resolve the planning issues of the South Norfolk boundary areas that it currently ignores, otherwise its soundness, factual base and public acceptance will be in doubt.

Joint Core Strategy Proposed submission Document

S - 11635 - 7523 - Policy 17: Smaller rural communities and the countryside - None

11635 Support

CHAPTER 6 Policy 17: Smaller rural communities and the countryside

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The Core Strategy presents a comprehensive spatial portrait and vision for the area, including policy proposals for the ecotown/urban extension to the north-east of Norwich. Policies and objectives have a strong focus on sustainable development.

Joint Core Strategy Proposed submission Document

S - 11638 - 7523 - Policy 18: The Broads - None

11638 Support

CHAPTER 6 Policy 18: The Broads

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The JCS presents an ambitious plan for a multi-functional network of green spaces and links. The network will require significant co-ordination to link fragmented habitats. There could be potential for agri-environment schemes to be linked with this network. While further detail will be for further development plan documents to deliver, the implementation framework does clearly set out how this network will be developed.

Joint Core Strategy Proposed submission Document

S - 11212 - 8484 - Policy 19: The hierarchy of centres - None

11212 Support

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Marks & Spencer Plc [8484]

Agent: Nathaniel Lichfield and Partners (Miss Catherine Widdowson) [8483]

Full Text: M&S supports the hierarchy of defined centres.

Summary: M&S supports the hierarchy of defined centres.

Joint Core Strategy Proposed submission Document

S - 11231 - 8537 - Policy 19: The hierarchy of centres - None

11231 Support

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Capital Shopping Centres Plc [8537]

Agent: Miss Hayley Cross [8528]

Full Text: CSC supports the identification of a hierarchy of centres for development of new retailing, services and other town centre uses. This is in line with government guidance. CSC agrees that Norwich City Centre should be ranked number one in the hierarchy as it serves notable urban and rural catchments and has the potential for additional shopping, employment and leisure uses. CSC agrees with the objective of this policy that development will be encouraged at a scale appropriate to the form and function of the hierarchy of defined centres. This is again in line with government guidance.

Summary: CSC supports the identification of a hierarchy of centres for development of new retailing, services and other town centre uses. This is in line with government guidance. CSC agrees that Norwich City Centre should be ranked number one in the hierarchy as it serves notable urban and rural catchments and has the potential for additional shopping, employment and leisure uses. CSC agrees with the objective of this policy that development will be encouraged at a scale appropriate to the form and function of the hierarchy of defined centres. This is again in line with government guidance.

Joint Core Strategy Proposed submission Document

O - 11265 - 8273 - Policy 19: The hierarchy of centres - iii

11265 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Planning Potential (Ms Katie Benford) [8273]

Agent: N/A

Full Text:

Summary: Policy 19 appears to suggest that new retailing and other town centre uses can only be located in the hierarchy of defined centres. Although we acknowledge that site specific guidance will be published at a later date, at present this is the Council's over-riding policy regarding the location of retail development. It therefore needs to be very clear in its wording. We therefore suggest that the Policy should have an additional sentence stating that new retail development can be located on edge-of-centre and out-of-centre sites where no sequentially preferable sites can be found in the identified centres, in line with PPS6.

Joint Core Strategy Proposed submission Document

S - 11293 - 8479 - Policy 19: The hierarchy of centres - None

11293 Support

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Mr Chris Mutten [8479]

Agent: Savills (Cambridge) (MR Mark Hodgson) [6854]

Full Text:

Summary: Policy 19 sets out the hierarchy of centres which is generally supported. In particular, the recognition that there is a need for policies within DPDs to refer to all categories including those services which are within villages. It is important that existing services and facilities are retained within villages to preserve the opportunities for sustainable development and to assist those areas where there are currently limited facilities.

Joint Core Strategy Proposed submission Document

S - 11380 - 8627 - Policy 19: The hierarchy of centres - i, ii

11380 Support

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: Objection 1: We support this policy Policy 19: The Hierarchy of Centres 3.19 We support the development of new retailing, services, offices and other town centre uses at a scale appropriate to the form and functions of the hierarchy stated. It should be noted that the Norwich Sub-region: Retail and Town Centres study October 2007 (NRTCS), which forms part of the evidence base for the JCPS, concludes that market towns, such as Wymondham, should: "maintain and enhance their roles in the face of increased competition from Norwich City" (NRTCS, Para 13.25) Furthermore, the NRTSC finds that: "Wymondham has an under-provision of convenience floorspace." (NRTCS, Para 13.113) It is also noted that Wymondham has a: "Quantitative need for 860 sqm net of new comparison goods retailing in 2016... An edge or out-of-centre location may be appropriate, provided that new development does not undermine the vitality and viability of the town centre." (NRTCS, Para 13.114) 3.20 In line with the findings of the NRTCS, the provision of new district centre offering a complementary role of convenience and comparison good retail space to that which already exists in the town centre forms an integral part of the proposed strategic site release at NE Wymondham. This is set out in detail in the Masterplan (Strategic Site Release Document) located in Appendix 6.

Joint Core Strategy Proposed submission Document

O - 11399 - 8388 - Policy 19: The hierarchy of centres - i, ii, iii

11399 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Tesco Stores Ltd [8388]

Agent: Martin Robeson Planning Practice (Luke Raistrick) [7162]

Full Text:

Summary:

Policy 19 identifies two new 'district centres' within the North East Growth Triangle and at Blue Boar Lane. This would result in an overprovision of district centres in the north east of Norwich. The Core Strategy therefore fails all three tests of soundness - 'Justified', 'Effective' and 'Consistent with National Policy'. It is considered that instead of designating two 'district centres' in these locations, a single 'large district centre' should be provided at Blue Boar Lane. JUSTIFIED PPS12 states that core strategies must be "founded on a robust and credible evidence base" and must be "the most appropriate strategy when considered against the reasonable alternatives" (Para 4.36). It is considered that the draft requirement for a new 'district centre' within the North East Growth Triangle has not been founded on an evidence base, nor is it the most appropriate strategy. It is appreciated that a sufficient evidence base has been collated to determine the scope and depth of many of the elements of essential infrastructure required to facilitate the amount of growth planned, however the evidence base does not determine the most suitable location(s) for this infrastructure, particularly in relation to the types of essential services which would tend to be found in district or local centres i.e. convenience goods retail. In the absence of such evidence, the following commentary provides a suitable evidence base which, following consideration of all options, concludes that the most suitable strategy is to deliver a single large comprehensive district centre at Blue Boar Lane to serve the needs of the 7000 prospective households, as well as many of the existing residents living in the north east of Norwich. Evidence Base - The future spatial distribution of service centres in north east Norwich will be necessary to serve both existing households in the north east of Norwich, and the 7,000 prospective households, with services/facilities in accessible locations. Therefore when considering the future spatial distribution of centres, it is necessary to consider the whole of north east Norwich, not just the growth triangle. Before allocating centres within North East Norwich, it is also necessary to understand the role and function of the different types of centres. PPS6 considers that; "District Centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library". "Local Centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette. In rural areas, large villages may perform the role of a local centre". PPS6 also identifies "small parades of shops of purely neighbourhood significance [that] are not regarded as centres for the purposes of this policy statement". Paragraph 6.8 of the adopted Local Plan confirms that district centres in the Norwich Policy Area will act as retail destinations first and foremost. They are "based on [a] superstore and...smaller units". The amount and variation of a centre's retail function will, to a large extent, dictate whether it holds a 'local' or 'district' role. The size of a centre's anchor foodstore will therefore help to define a centre. The spatial distribution of the planned growth in north east Norwich is illustrated in the Growth Triangle AAP - Options for Growth Questionnaire (See Appendix 1). It identifies three main land parcels. The Blue and Red land parcels are located such that they would act as urban extensions to the city. The Yellow land parcel would become a stand-alone village (perhaps an 'Ecotown'), with a degree of separation between itself and the future Norwich urban boundary. The enclosed 'Future District Centre Spatial Distribution Diagram' (See Appendix 2) illustrates how current and future north east Norwich residents could be served spatially by the existing network of district centres, providing for their everyday needs. The extents of the broad catchments are dictated subject to the respective district centre's attraction by virtue of the depth and breadth of facilities and services available, and by their locational spread i.e. their gravity. Future residents living in the eastern half of the blue land parcel and the northern half of the red land parcel could be served (along with the existing Sprowston residents) by the Sprowston District Centre. Residents living in the western half of the blue land parcel could be served by the Old Catton District Centre, whilst those in the southern half of the red parcel could be served by the Thorpe St Andrew District Centre. Owing to the proximity of existing district centres, delivering a new district centre within either the Blue or Red land parcels would have an undue impact (caused by increased competition) to existing neighbouring district centres, and the new district centre itself would fail to perform strongly. This would be counter productive in terms of developing a successful network of centres in north east Norwich. This should not however preclude delivering local centres, accessible by foot, within the Blue and Red land parcels. In terms of the Yellow land parcel, the associated residents could also look to Sprowston District Centre to serve their everyday needs, particularly food shopping. It is considered that the new settlement within the yellow land parcel would not be sufficiently large to sustain its own supermarket, which is a key element of any district centre. It is understood that the land parcel would accommodate up to 4000 new households which would each typically spend in the order of £4000 per annum on convenience goods. The total yearly convenience goods spend within the village would therefore be approximately £16,000,000. Considering a typical foodstore would have a yearly turnover density of approximately £12,000/m², the village could support a foodstore of approximately 1333m² only (assuming that 100% of the convenience goods expenditure generated by new residents was attracted to it). If more realistic assumptions are applied, it would not be possible to justify a store of greater than 1000m². A store of this size would struggle to attract main food shopping trips owing to the limited product ranges and no doubt poor availability of popular items. Shoppers would demand broader ranges and would look to nearby facilities for them as a result. Foodstore operators would be aware of this, and are likely to be reluctant to operate a store of this size from this location. Without an appropriate anchor, a district centre would not be viable in this location. This would not however preclude delivering local centres, accessible by foot, within the Yellow land parcel. Generally speaking, in order to deliver the most sustainable core strategy, and reduce the amount of vehicle borne trips, a single comprehensive district centre should be delivered,

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Joint Core Strategy Proposed submission Document

O - 11399 - 8388 - Policy 19: The hierarchy of centres - i, ii, iii

11399 Object

CHAPTER 6 Policy 19: The hierarchy of centres

which includes all the essential everyday services/facilities required by future residents. Disaggregating these services/facilities between two district centres will inevitably cause unsustainable patterns of travel. The core strategy evidence base sets out what additional infrastructure is required to support the growth to the north east of Norwich. In terms of essential infrastructure which would typically be located within a district centre, the following has been identified; * 2 x 300m² community spaces* 600m² community space* Library* 4 x indoor courts* Primary Care Centre* 2 x 60 place nursery* 2 x 420 place primary schools* 1,400 place secondary school Considering the Blue Boar Lane site already includes a Tesco foodstore, and 5 additional shop units, delivering a majority of these additional uses in the vicinity of the Blue Boar Lane store would facilitate a suitably located comprehensive district centre serving the additional 7000 households and existing residents living in the north east of Norwich. It is also likely that connections to/from the district centre would be significantly improved as a result of the proposed BRT. Aggregating this range of services/facilities (including the existing foodstore and other retail uses) within a single holistic district centre will also create a necessary critical mass, thereby increasing the vitality and viability of the centre. It is considered that this district centre would serve an extensive urban population and would therefore function as a 'Large District Centre' within the hierarchy of centres. Therefore, in order to make the Core Strategy sound, Policy 19 should be updated by deleting the text - "New district centres/high streets to be established within the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, at Blue Boar Lane, Sprowston and Hall Road, Norwich", and replacing it with - "A new district centre will be established at Hall Road, Norwich". The following sentence should be included at the end of bullet point 2 - "A new large district centre will be established at Blue Boar Lane, Sprowston". As a result of this amendment, the sentence - "a district centre based around an accessible 'high street' and including a new library, education and health facilities", within Policy 10, would also require updating as follows - "a district centre at Blue Boar Lane and including a new library, education and health facilities". EFFECTIVEPPS12 states that core strategies must be "deliverable" (Para 4.44). It is considered that by designating two 'district centres' to serve the existing and prospective households in the north east of Norwich, the core strategy will not be deliverable - particularly in relation to the core strategy's 'Spatial Vision' - "New and expanded communities will be highly sustainable with good access to local jobs and strategic employment areas and will be served by new or expanded district and local centres providing shops, health, education, services and facilities easily accessible by foot, bicycle and public transport" (p6). For the reasons set out in the above evidence base, in order for the anticipated growth in Norwich to be 'highly sustainable', a single holistic district centre should be created at Blue Boar Lane. Therefore, in order to make the Core Strategy sound, Policy 19 should be updated by deleting the text - "New district centres/high streets to be established within the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, at Blue Boar Lane, Sprowston and Hall Road, Norwich", and replacing it with - "A new district centre will be established at Hall Road, Norwich". The following sentence should be included at the end of bullet point 2 - "A new large district centre will be established at Blue Boar Lane, Sprowston". As a result of this amendment, the sentence - "a district centre based around an accessible 'high street' and including a new library, education and health facilities", within Policy 10, would also require updating as follows - "a district centre at Blue Boar Lane and including a new library, education and health facilities". CONSISTENT WITH NATIONAL POLICYPPS6 states that - "authorities should plan carefully how best to distribute any identified growth [throughout the network of centres] to achieve the objectives of their spatial strategy" (Para 2.9). The core strategy's 'Spatial Vision' states - "New and expanded communities will be highly sustainable with good access to local jobs and strategic employment areas and will be served by new or expanded district and local centres providing shops, health, education, services and facilities easily accessible by foot, bicycle and public transport" (p6). It is considered that by designating two 'district centres' to serve the existing and prospective households in the north east of Norwich, the core strategy's spatial strategy will not be achievable. For the reasons set out in the above evidence base, in order for the anticipated growth in Norwich to be 'highly sustainable', a single holistic district centre should be created at Blue Boar Lane. Therefore, in order to make the Core Strategy sound, Policy 19 should be updated by deleting the text - "New district centres/high streets to be established within the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle, at Blue Boar Lane, Sprowston and Hall Road, Norwich", and replacing it with - "A new district centre will be established at Hall Road, Norwich". The following sentence should be included at the end of bullet point 2 - "A new large district centre will be established at Blue Boar Lane, Sprowston". As a result of this amendment, the sentence - "a district centre based around an accessible 'high street' and including a new library, education and health facilities", within Policy 10, would also require updating as follows - "a district centre at Blue Boar Lane and including a new library, education and health facilities".

Joint Core Strategy Proposed submission Document

O - 11543 - 7040 - Policy 19: The hierarchy of centres - i

11543 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Sainsburys Supermarket Ltd [7040]

Agent: Indigo Planning Ltd. (Mr Sean McGrath) [4163]

Full Text:

Summary:

Sainsbury's currently operates three stores in the Joint Core Strategy Area at: Pound Lane, Norwich (Broadland District Council); Longwater Retail Park (South Norfolk District Council); and Queens Road, Norwich (Norwich City Council). In addition, Sainsbury's are interested in pursuing future opportunities to enhance their retail offer in the Joint Core Strategy area. Therefore, they are keen to be involved in the Local Development Framework process. Joint Core Strategy Submission Document With regard to the proposed hierarchy of centres as set out in Policy 19, and in context of planned growth area, we note that new District Centres are proposed at location throughout the Joint Core Strategy area. The proposed large-scale housing areas will provide for shops and services to meet local needs where they are not served from existing centres. In addition to the centres identified, we continue to propose that the Sainsbury's store at Longwater Retail Park warrants designation as a suitable anchor for a District Centre to support the planned growth for Easton/Costessey as a location for major change and development. The principle of a convenience food store anchoring a District Centre is accepted by the Council in the Growth Triangle Area at Blue Boar Lane, Sprowston. The Longwater store offers a wide range of goods and services and is centrally located to serve the neighbouring residents of Queens Hill, users of the surrounding employment uses and the future planned growth for the area. The store already functions as a District Centre and the planned growth in the area will further enhance the store's role in servicing the local community. Sainsbury's is committed to working with the local planning authorities to enhance the convenience retailing offer in the Joint Core Strategy Area and we would welcome the opportunity to meet with officers to discuss Sainsbury's aspirations for future development in the area.

Joint Core Strategy Proposed submission Document

O - 11587 - 8591 - Policy 19: The hierarchy of centres - i, ii

11587 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We agree with the comment at Policy 19 that the development of new retailing, services, offices and other town centre uses will be encouraged at a scale appropriate to the form and function of the hierarchy of centres defined in Policy 19. We question the inclusion of Long Stratton within the hierarchy with other large villages and would observe that, as noted at paragraph 6.52 of the PSD, it is necessary to review the position of Long Stratton within the hierarchy of defined centres in the light of the proposed growth of the settlement. Potential enhancements to the centre of Long Stratton, achievable once through traffic has been removed, would mean that the settlement should be viewed within the context of Policies 19 and 13 of the JCS as a Main Town. The Key Diagram should show Long Stratton as a Main Town as a result of its role to the delivery of the growth agenda.

Joint Core Strategy Proposed submission Document

O - 11644 - 8610 - Policy 19: The hierarchy of centres - None

11644 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Royal London Mutual Insurance Society Limited Agent: Savills(Manchester) (Mr Tim Price) [4303]
[8610]

Full Text:

Summary:

Policy 19: The hierarchy of centres We note the hierarchy of centres in the Policy. We confirm our request for this to be extended to include Longwater Retail Park. The justification for this extension to the Policy would reflect the established nature of the Retail Park and wider commercial area and the increased role it can play in meeting the retail needs of the residents of the proposed expanded Easton/Costessey area. The role that the Retail Park plays has been acknowledged by South Norfolk Council through the recent grant of planning permissions for further retail development at the site and it is firmly established within local shopping and travel patterns. given the established nature of the site, we formally request that the Retail Park should be designated as a Category 2 large district centre and accordingly, the Policy be amended as follows: 'The development of new retailing, services, offices and other town centre uses as defined by government guidance will be encouraged at a scale appropriate to the form and functions of the following hierarchy of defined centres: 1. Norwich City Centre 2. The town and large district centres of: Longwater retail area...'

Joint Core Strategy Proposed submission Document

O - 11679 - 8270 - Policy 19: The hierarchy of centres - None

11679 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Henderson Retail Warehouse Fund [8270]

Agent: Savills(Manchester) (The Manager) [8269]

Full Text:

Summary:

We confirm our support for the GNDP's decision to designate the Retail Park as a defined retail centre. The Retail Park is designate as a large district centre by Policy 19 (i.e Category 2 (town and large district centre) in the retail hierarchy set out by the Policy). Paragraph 6.67 in the supporting text states that: 'Categories 1 (i.e Norwich City Centre) and 2 respectively group the largest town centres of Norwich and the Main Towns (plus Large district centres) which serve notable urban and rural catchments and have the potential for additional employment, leisure and shopping uses.' In addition, Paragraph 6.71 confirms that: 'The district centres will be considered for additional improvements as shopping destinations'. This accords with recent discussions we have had with Norwich City Council who confirm that retail land uses are acceptable in this location and that it does not have any in principle objection to additional development at the Retail Park. We support the GNDP in its proposal to designate Riverside Retail Park as a defined retail centre that is intended to reflect its catchment. We also support the commentary that additional improvement to the Retail Park will be considered. This continues the emphasis of the allocation of the Retail Park in the Local Plan and recognises the integral role and function that it plays in the retail offer of Norwich and the wider Norfolk area. However, we consider that the hierarchy designation for Norwich City Centre should be broadened to include the Retail Park (i.e. a reclassification of the Retail Park from a Category 2 to Category 1). This would accord with the current allocation of the Retail Park and also our request in our letter, dated 17 April 2009, for the Retail Park to be allocated within the forthcoming Site Allocation Development Plan Document (DPD) as a 'Primary Retail Area' within the 'City Centre Retail Area' (or such named equivalents). The justification for the Retail Park to be classified as Category 1 is as a result of its location within the City Centre and the integral role and function that it plays in the retail offer of the City Centre. Further details of this are set out in the description of the Retail Park above and our enclosed letters. Therefore we request an amendment to Policy 19 as follows:

Joint Core Strategy Proposed submission Document

O - 11681 - 8198 - Policy 19: The hierarchy of centres - i, ii, iii

11681 Object

CHAPTER 6 Policy 19: The hierarchy of centres

Respondent: Ms Karen Drane [8198]

Agent: Waterfront (Mr Robert Delafield) [7828]

Full Text:

Summary:

Our clients are currently developing plans for the development of a 10 acre site adjoining Taverham Nursery Centre, Fir Covert Road, Taverham. This is to provide a mixed use scheme to include a medium size food store (approx 2,100sqm gross), a family pub diner, starter office units, community facilities including a children's nursery and possible future provision for a GP surgery. In addition further investment in the garden centre business with additional car parking and an extension to the existing buildings. Our comments on the proposed Submission Core Strategy document in respect of the site are set out below. These comments principally relate to Policy 19 (hierarchy of centres) and the supporting text. Policy 19 seeks to establish the hierarchy of towns, first Norwich City Centre, next the towns of Aylsham, Diss, Harleston and Wymondham and large district centres within the Norwich urban area including Anglia Square and Riverside and finally large villages and smaller district centres including Old Catton, Sprowston, Rackheath, Thorpe St Andrews, Blue Boar Lane and Hall Road. The Policy is unsound and not legally compliant for the following reasons:- The policy fails to include Taverham within this hierarchy. Taverham has all of the characteristics of an existing District Centre. The inclusion of the proposed food store and additional community facilities would place Taverham within the second tier, namely large district centre.- The policy does not place an equal emphasis on, nor consider the needs of, Taverham and its adjoining settlement of Thorpe Marriot in respect of size of population relative to other areas within the Norwich urban area. Taverham (12,488) is larger than Old Catton (6,200) and a proposed expanded Rackheath (7,000) and is comparable to Thorpe St Andrews and Sprowston (14,000 respectively).- No consideration has been given to Taverham's existing retail uses, existing employment and potential new opportunities available, consistent with sustainable growth objectives.- There is no justification provided as to why a significant mixed use proposal providing additional district centre facilities has not been included.- (Please see PPS6). Smaller district centres, including those proposed by GNDDP are compromised to a lesser or greater extent in terms of the range of services provided. A food store is normal but not a pre-requisite. The existing facilities either on site or close by provide district centre services to the community. These include 20 shops, vets, children's play barn, restaurant/café and a wide range of ancillary retail uses associated with the home, garden and outdoor recreational life. GNDDP's own retail study comments that district centres "need to identify and build upon their unique attractions to draw greater proportions of tourists and all year round visitors' spend to help underpin overall vitality and viability". Taverham and this location in particular already attracts inward investment.- The needs of Taverham need to be addressed and a district centre status in this "forgotten" northwest quarter of Norwich Urban Area is justified.

Joint Core Strategy Proposed submission Document

O - 11206 - 8507 - 07 Implementation and monitoring (POLICY 20) - i, ii

11206 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Mr R Smith [8507]

Agent: Beacon Planning Ltd (Ms Jenny Page) [7833]

Full Text:

Justified: Failure to make appropriate assumptions or to reflect background evidence and consider reasonable alternatives. Effective: Failure to recognise that funding has not been guaranteed particularly for essential upfront investment and cannot be for the foreseeable future. As such the Plan is currently not deliverable. Failure to incorporate sufficient flexibility to deal with different funding scenarios or drop in neither housing delivery nor are there any proposed remedial actions in place. Given the current economic situation this is vital. Why DPD unsound CLG Study of Spatial Planning identified common weaknesses of emerging LDFs to be centred on a failure to provide evidence about how infrastructure is to be delivered. PPS12 states that a core strategy should recognise that circumstances can change over time, especially over the 15 year time frame of a core strategy. It should show what alternative strategies have been prepared to handle this uncertainty and what triggers their use. Para 4.9 requires that good infrastructure planning considers the infrastructure required to support development, costs, sources of funding, timescales for delivery and gaps in funding. The GNDP has through its various studies which identified requirements and providers. The Joint Core Strategy contains an Implementation Plan but fails to recognise that funding is not in place and that there is a very real possibility that it will not be forthcoming in the near future. It has failed to act upon the findings of the background studies in not giving serious consideration to the necessary policy or strategies if the hoped for funding does not appear. The Greater Norwich Infrastructure Needs and Funding Study (EDAW) identified a substantial funding gap with transport and utilities as critical to delivering growth. The report emphasises the requirement for further work necessary to find funding. The EDAW report advises investigating a 'cocktail' of funding sources. Public sector funding has to provide the necessary up front funding to enable vital infrastructure to be put in place before development goes ahead. Developer contributions by S106 or tariff system will not come forward in any significant amounts until development gets underway. However, there has been no commitment from central government to date to provide the necessary funding. The EDAW report considers a tariff system as a means of making a contribution but warns that tariff levels which did not completely stifle development would not be sufficient to bridge the funding gap. It would require additional funding from the public sector to pump prime infrastructure investment. A number of key stakeholders central to the process have warned in recent documents of the critical importance of the provision infrastructure in the delivery of the proposed housing targets.

Norfolk County Council in responding to the East of England Plan Review to 2031 (report to Cabinet dated 9 November 2009) stated: 'the County was facing a huge challenge to deliver the 78,700 homes required to 2021.' It emphasises that the recession will have a severe impact on housing delivery for at least five years. It draws attention to the infrastructure requirements which if funding is not forthcoming will severely curtail housing delivery and would certainly delay potential start dates of major new developments to 2020. One example is the electricity supply. The County Council states 'there are major power supply gaps around Norwich in the A11 corridor and there is currently no clear solution to providing upfront investment required.' It further states that 'In addition, it is clear that sources of public and private funding for infrastructure are effectively drying up.' The County Council conclude that 'there is a strong likelihood that we will be faced with trying to build more housing without the infrastructure to deliver sustainable communities.' GNDP in their letter dated 13 November 2009 to EERA regarding the East of England Plan Review to 2031 clearly recognise that the current situation is critical in delivering the stated requirement to 2021 let alone beyond. With regard to infrastructure GNDP state: 'It is becoming clearer that the impact of the recession on public finances and private lending will result in less public investment and more constrained developer funding, particularly in the early review period.' GNDP identifies a wide range of infrastructure is required to deliver growth. It warns that: 'there are significant showstoppers without which the current scale of growth cannot be delivered, let alone any additional growth. The letter goes on to outline the 'showstoppers' which include strategic green infrastructure, water infrastructure, the Northern Distributor Road, A47 Southern Bypass junction improvements and the Long Stratton Bypass. With the possible exception of green infrastructure all other elements will require front loaded funding through public sector investment. This is reiterated in the GNDP Topic Paper Transport November 2009 which acknowledges that the funding for the transport element alone is dependent upon successful bids to central government sources. Even then there is a shortfall which would need to be covered by Norfolk County Council and developer contributions. Given the current economic downturn the prospects for securing funding from private lending sources is poor. In referring to the EERA proposals for additional housing beyond 2011 the GNDP states: 'The ability to fund this infrastructure in the current and foreseeable economic climate is questionable. Increased growth targets are seriously flawed if funding to deliver infrastructure cannot be demonstrated.' The pragmatic view given in this letter is welcomed but the Core Strategy does not in any way reflect this stance.

Summary:

The GNDP has identified infrastructure requirements and providers but fails to recognise that funding is not in place and that there is a very real possibility that it will not be forthcoming in the near future. It has failed to act upon the findings of the background studies in not giving serious consideration to the necessary policy or strategies if the hoped for funding does not appear.

Joint Core Strategy Proposed submission Document

O - 11232 - 6956 - 07 Implementation and monitoring (POLICY 20) - i, ii

11232 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Norfolk Homes Ltd (Mr Terence Harper) [6956]

Agent: Wheatman Planning Ltd (Mr Simon Wheatman) [8417]

Full Text:

Section 106 requirements are continually escalating and can become a significant barrier to future housing delivery particularly in the current economic climate where landowners are holding sites and not releasing them for development, rather waiting for improved land values. The addition of the Community Infrastructure Levy (CIL) could increase the financial demands which would further detract from the value of land, and with no guarantee of the services being provided. There are further real concerns that greenfield sites could be made unviable with some of the CIL figures being discussed in the current market. The LPA's need to prioritise what are the essential elements needed to deliver the sites. Policy 20 should be amended to enable the viability of a site to be considered when determining the scale and value of contributions required through a section 106 obligation and also when in conjunction with the Community Infrastructure Levy. Additionally, it is essential that all measures required by s106 obligations are willingly adopted by public bodies. While guidance and requirements of some consultees are driving forward various initiatives, the relevant bodies are often reluctant to adopt; one such example being SuDS schemes where these are placed within public open space and some local authorities resisting the adoption of open space that is not strictly functional. The use of local infrastructure management bodies or other partnerships to manage facilities should be avoided because many lenders and the legal profession are wary of such bodies because of the potential for them to: 1. Raise costs beyond reasonable levels. 2. Cease to deliver appropriate levels of service, or 3. Fundamentally cease to exist for numerous reasons. It is therefore considered that Policy 20 is unsound."

Summary:

Section 106 requirements can become a significant barrier to future housing delivery. The addition of the Community Infrastructure Levy (CIL) could increase the financial demands which would further detract from the value of land, and with no guarantee of the services being provided. The LPA's need to prioritise what are the essential elements needed to deliver the sites. It is essential that all measures required by s106 obligations are willingly adopted by public bodies and that local infrastructure management bodies or other partnerships are not used.

Joint Core Strategy Proposed submission Document

O - 11250 - 8547 - 07 Implementation and monitoring (POLICY 20) - i, ii, iii

11250 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: Policy 20 requires development to provide enhanced public access to the Yare Valley and the creation of a country park at Bawburgh Lakes. No objection is raised to the principle, of such a country park or to enhanced access to the Yare Valley. However, it is unclear how these objectives will be achieved as land is not within the ownership of the partners. Delivery of the partners' masterplan will provide significant new open spaces to meet the needs arising from the development.

Summary: Policy 20 requires development to provide enhanced public access to the Yare Valley and the creation of a country park at Bawburgh Lakes. No objection is raised to the principle, of such a country park or to enhanced access to the Yare Valley. However, it is unclear how these objectives will be achieved as land is not within the ownership of the partners. Delivery of the partners' masterplan will provide significant new open spaces to meet the needs arising from the development.

Joint Core Strategy Proposed submission Document

O - 11251 - 8547 - 07 Implementation and monitoring (POLICY 20) - i, ii, iii

11251 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: There is no need for policy 20 to list the broad types of infrastructure which are considered essential. Other policies in the Plan already identify these infrastructure requirements. The items listed do not all constitute essential infrastructure. For example, whilst public art may be desirable, it cannot be said to be essential to allowing development to proceed. Waste management facilities and emergency facilities should be funded out of local taxation and are not something to be subsidised by development. The approach suggested appears to start by requiring development to fund facilities and services and then to consider additional means of funding any gap. The approach should be turned around. The S106/CIL should be set after having determined the level of funding available via mainstream government funding, the investment programmes of public bodies and consideration of mechanisms such as Tax Increment Financing.

Summary: The items listed do not all constitute essential infrastructure. For example, whilst public art may be desirable, it cannot be said to be essential to allowing development to proceed. Waste management and emergency facilities should be funded out of local taxation not subsidised by development. The approach suggested starts by requiring development to fund facilities and services and then to consider additional means of funding any gap. The S106/CIL should be set after having determined the level of funding available via mainstream government funding, the investment programmes of public bodies and consideration of mechanisms such as Tax Increment Financing.

Joint Core Strategy Proposed submission Document

O - 11343 - 8570 - 07 Implementation and monitoring (POLICY 20) - ii

11343 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Hethersett Land Ltd (Hethersett Consortium) [8570] **Agent:** Bidwells Norwich (309) (Mr John Long) [8211]

Full Text: Hethersett Land Ltd considers that there is a weakness in the SA report, in that it has failed to look at the cumulative impacts of the South Norfolk dispersal strategy. Whilst it is suggested in the document that looked individually, "...the scale of growth at each settlement does not put in place a question over the overall JCS's sustainability", Hethersett Land Ltd suggests that the cumulative impact of the level of growth dispersed throughout South Norfolk should have considered the cumulative impact on the sustainability objectives of the JCS. Hethersett Land Ltd contend that the action of building up to 4,600 new homes at settlements in the NPA and rural area (1800 Long Stratton, 1800 South Norfolk small sites somewhere in the NPA; 1000 South Norfolk small sites in rural South Norfolk), where in reality the main level choice will be the private motor car will have cumulative impact on transport patterns and an increase on carbon emissions and certainly does nothing to reduce them. This is directly contrary to the JCS sustainability objectives, and its lack of acknowledgement is a significant failure in the SA's approach.

Summary: Hethersett Land Ltd contends that Policy 20 fails the Effective soundness test because it does not sufficiently demonstrate how the Joint Spatial Strategy will be delivered. Policy 20 is little more than aspirational, far too vague and provides no certainty of the funding and phasing of growth and the infrastructure needed to support growth. It also fails to demonstrate how the levels of strategic growth proposed at in South Norfolk are sufficient to fund the expected infrastructure and other policy requirements, particularly given the information in the EDAW Infrastructure Needs and Funding Study Report. However, its biggest failure is that it provides no response to current market conditions, or any acknowledgement of the fact that public funding is going to be severely restricted for the short-medium term at least. Hethersett Land Ltd suggests that Policy 20 needs to go much further than it does in explaining how the plan will be implemented given the scale of infrastructure required, as evidenced in the EDAW Infrastructure Needs and Funding Study Report. Given that the GNPD knows the scale of infrastructure required, the prospects of public funding availability and the implications of applying a tariff approach on scheme viability, the JCS should be setting out in the implementation section the mechanism for delivering growth in light of these issues and particularly given the current market, which may take time to recover. Policy 20 fails to acknowledge the issues raised in the EDAW Infrastructure Needs and Funding Study concerning the limited level of strategic growth at South Norfolk Settlements; the cost of infrastructure needed to support it, the limited availability of public funding and the resulting land values. Possibly because it would help to demonstrate that the South Norfolk approach to growth dispersal results in some cases in an undeliverable strategy. Hethersett Land Ltd argue that if the JCS's implementation considerations were properly considered it would have resulted in a different spatial strategy in South Norfolk, and one that would have acknowledged that the best way to secure supporting infrastructure needed for sustainable communities is to focus growth in a smaller number of locations, rather than spread it around. The approach therefore fails the Justified soundness test because it does not reflect the most appropriate strategy when considering the alternatives. The EDAW Infrastructure Needs and Funding Study Report demonstrates that growth is unlikely to be delivered using the existing S106 mechanism, as it leaves insufficient land values. It is arguable whether CIL will be suitable. Therefore a different growth strategy is required including more innovative delivery mechanisms. These issues should have been explored in the Implementation Policy. The section also fails the Effective soundness test because it is clear that there is no contingency plan. For instance, there is no 'Plan B' to take account of a delay or non-delivery of the Northern Distributor Road, and/or the resultant under delivery of housing in other locations. Also, it completely ignores market factors, and provides no advice on flexibility to take account of changes in the housing market and land values.

Joint Core Strategy Proposed submission Document

S - 11350 - 2373 - 07 Implementation and monitoring (POLICY 20) - None

11350 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Persimmon Homes (Anglia) [2373]

Agent: RPS (Cambs office) (Ms Helen Phillips) [4285]

Full Text:

Summary:

We support in principle the use of CIL as this provides more certainty for developers and should spread some of the cost of growth related infrastructure between different types and sizes of development. We have previously commented that it is essential that, in developing this approach, there is a direct relationship maintained between the process for establishing the charging schedule, the infrastructure planning process and the development plan strategy. Also, that the setting of CIL at a realistic level in the charging schedule is something that must be both fully consulted upon and examined independently as part of the LDF process. The accompanying text confirms that this is the intention, which is welcomed. The setting of CIL at a realistic level is particularly important given current economic conditions. If it is set too high or at a level of higher than current normal section 106 costs, there is a real danger of schemes being unviable and undeliverable. It is also essential that the relationship between CIL and planning obligations is such that there is no confusion or double payment. This should be made clear in the accompanying text.

Joint Core Strategy Proposed submission Document

O - 11381 - 8627 - 07 Implementation and monitoring (POLICY 20) - i, ii

11381 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: United Business and Leisure, The Barnard Family & Others [8627] **Agent:** Barton Willmore Planning Partnership (Mr Lee Newlyn) [7121]

Full Text: Main submission received 14 December 2009. Further Opinion received, and attached here, on 25 January 2010.

Summary: We object to Policy 20 because it is far too general and should provide much more information on how the major strategic sites Wymondham and NE Norwich are to be implemented and where funds are coming from and how they are phased. Without this information the effectiveness test of the plan will not be passed. We provide an example of the information required in the appendices accompanying our full responses. We note that Appendix 8 of the Joint Core Strategy Proposed Submission Document for Broadland, Norwich and South Norfolk (Nov 2009) proposal contains some high level costing data, but it is too general and does not provide a clear picture whether agreement has been secured with third parties on the delivery of key infrastructure. At the moment the Joint Core Strategy for Broadland, Norwich and South Norfolk provides a generalised wish list of infrastructure projects with a broad and unrealistic costing. There is no indication of how viable the schemes are; how critical to the delivery plan they are; and whether there is a reasonable prospect of implementing them. It also does not provide enough detail on timeframes and infrastructure required to deliver individual housing areas. This is especially important to those developments that will come forward earlier in the plan period. Furthermore, there remains doubt over whether central government funding will be secured for the Norwich Northern Distributor Road. Policy 20 should be redrafted with a clearer focus on who does what and when and identify the specific pieces of infrastructure and corresponding funding sources in order to ensure delivery and effectiveness of the plan. This should be carried out for each of the proposed major growth locations, because there will clearly be site specific issues which will necessitate an individual approach. It is also, in our opinion, necessary to provide a diagram that summarises the key dependencies, in terms of infrastructure, and when the individual strategic housing developments will be delivered in order to aid delivery and the ongoing monitoring of the plan. We therefore propose that an individual policy be drafted for each growth location along the lines of the following: Policy 20 (a) Implementation at Wymondham A Strategic Site Policy for the expansion of Wymondham to deliver up to 4,000 homes by 2026 and a further 2,500 thereafter will be permitted, provided:-* A Supplementary Planning Document/masterplan is agreed with the Greater Norwich Development Partnership in advance of any planning applications and all planning applications accord with it* The scale and layout of the proposed development is planned in a way that creates a new district centre for the benefit of the whole of the settlement* The scale and the rate of the release of the development keeps in line with infrastructure and other elements of a balanced community (e.g. schooling provision and retail)* A phasing programme is agreed in advance of the determination of any planning applications* It can be demonstrated that there are community and environmental benefits with the scheme which will need to include development contributions towards the cost of building new primary school provision; a new secondary school; new health centre and community facility* Structural landscaping, incorporating existing vegetation, is retained and reinforced* Expansion of the town will be of a quality that will retain and enhance the distinctive character of the existing historic centre* Extensive levels of green infrastructure will be delivered to create a "Ketts Country" pastoral landscape* Enhanced bus services to the Norwich City Centre are delivered * Provision is made for improved pedestrian and cycle access to the existing settlement* Vehicular access to land forming the North Wymondham growth location is achieved by a modified junction design on the A11 Policy 20 (b) Implementation at N E Norwich We also propose a similar Strategic Site Policy in N E Norwich for the release of up to 7,000 homes to 2026 and a further 3,000 thereafter will be permitted provided:-* A Supplementary Planning Document/masterplan is agreed with the Greater Norwich Development Partnership in advance of any planning applications and all planning applications accord with it* The scale and layout of the proposed development is planned in a way that creates a new district centre for the benefit of the whole of the settlement* The scale and the rate of the release of the development keeps in line with infrastructure and other elements of a balanced community (e.g. schooling provision and retail)* A phasing programme is agreed in advance of the determination of any planning applications* It can be demonstrated that there are community and environmental benefits with the scheme which will need to include development contributions towards the cost of building new primary school provision; a new secondary school; new health centre and community facility* Structural landscaping, incorporating existing vegetation, is retained and reinforced* Development will be of a quality that will retain and enhance the distinctive character of the existing areas.* Extensive levels of green infrastructure will be delivered to create Country Parks.* Enhanced bus services to the Norwich City Centre are delivered * Provision is made for improved pedestrian and cycle access to the existing settlement area and the countryside* The link road between the Salhouse Road and Plumstead Road is to be completed in its entirety before residential development commences south of Plumstead Road and will not be reliant upon completion on the committed development north of Salhouse.

Conclusions We summarise below the tests which most relate to the appropriate objection: Policy 1: Addressing climate change and protecting environmental assets Objection 1. The policy is too general and merely repeats national guidance and the East of England Regional Spatial Strategy 2. It does not set quantifiable targets in order to reduce carbon emissions Test of Soundness 1 Effectiveness 2 Effectiveness Policy 3: Energy and Water Objection 1. The policy is too general 2. It does not set not set quantifiable targets in order to reduce carbon emissions 3. It does not consider viability of schemes in context of energy/water efficiency improvements Test of Soundness 1 Effectiveness 2 Effectiveness 3 Effectiveness Policy 4: Housing Delivery Objection 1. The evidence base, including Strategic Housing Land Availability Assessment and Greater Norwich Infrastructure Needs and Funding Study (Oct 2009), has not informed the Joint Core Strategy for Broadland, Norwich and South Norfolk 2.

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Joint Core Strategy Proposed submission Document

O - 11381 - 8627 - 07 Implementation and monitoring (POLICY 20) - i, ii

11381 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Too few options for development were considered³. Lack of logical and complete justification for submitted option⁴. Need more flexible/responsive housing land supply⁵. Failure to deliver a 5 year housing supply and 2021 East of England Regional Spatial Strategy target⁶. Failure to deliver affordable housing needs^{Test of Soundness1} Justification² Justification³ Justification⁴ Effectiveness⁵ Effectiveness⁶ Effectiveness^{Policy 5: The economy}Objection¹. Failure to identify Regional Strategic and Sub-Regional Strategic employment sites as required by the East of England Regional Spatial Strategy and show them on Proposal Plan^{Test of Soundness1} Effectiveness^{Policy 6: Access and Transportation}Objection¹. We support emphasis on transportation but are concerned about the over reliance on new road infrastructure, which is contrary to spatial objectives. 2. Failure to deliver a Bus Rapid Transit at Wymondham through lack of growth^{Test of Soundness1} Effectiveness² Effectiveness^{Policy 7: Supporting Communities}Objection¹. The current Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) pattern of growth does not maximise development in the most sustainable locations and chooses some locations poorly represented with facilities and based on achieving road solutions. 2. The current Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) pattern of growth is dispersed and not sufficient in scale to deliver critical new infrastructure^{Test of Soundness1} Justification/^{Effectiveness2} Effectiveness^{Policy 9: Strategy for growth in the Norwich Policy Area}Objection¹. The evidence base, including the Strategic Housing Land Availability Assessment, Greater Norwich Infrastructure Needs and Funding Study (Oct 2009) and PreRJCS, has not informed the Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009)². Lack of logical and complete justification for submitted option³. Presence of misleading evidence on infrastructure costs and inaccurate representation of such costs⁴. Need more flexible/responsive housing land supply (there is a need for a 12.5% contingency)⁵. Failure to deliver a 5 year housing supply and 2021 East of England Regional Spatial Strategy target⁶. The current Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) pattern of growth is dispersed and will miss an opportunity to deliver critical new infrastructure.^{Test of Soundness1} Justification² Justification³ Justification⁴ Effectiveness⁵ Effectiveness⁶ Effectiveness^{Policy 10: Locations for major new and expanded communities}Objection¹. The current Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) pattern of growth does not maximise development in the most sustainable locations. 2. The current Joint Core Strategy for Broadland, Norwich and South Norfolk Proposed Submission Document (Nov 2009) pattern of growth is too dispersed and will miss an opportunity to deliver critical new infrastructure³. We object to the reliance placed on growth needed and located to bring forward new roads. 4. Focussing development on settlements with good existing infrastructure will lower risk and bring forward development earlier^{Test of Soundness1} Justification/^{Effectiveness2} Effectiveness³ Effectiveness⁴ Effectiveness.^{Policy 11: Norwich City}Objection¹. The policy is too general and provides no indication of when the development will be delivered and by whom and when.². There are no output/outcome driven targets^{Test of Soundness1} Effectiveness² Justification/^{Effectiveness3} Effectiveness^{Policy 12: The remainder of the Norwich urban area, including fringe parishes}Objection¹. The policy is too general and provides no indication of when the development will be delivered and by whom and by when.². There are no output/outcome driven targets^{Test of Soundness1} Effectiveness² Justification/^{Effectiveness3} Effectiveness^{Policy 14: Key Service Centres}Objection¹. Whilst we generally support this policy, we do have concerns with regard to directing the proposed 1,000 and 1,800 new homes to Hethersett and Long Stratton respectively. Such growth is disproportionate given their Key Service Centre Status and in Long Stratton relates to a road proposal and in Hethersett misunderstands the gap policy.^{Test of Soundness1} Justification^{Policy 15: Service Villages}Objection¹. Whilst we support this policy, "small scale" requires more precise definition.². We object and can find no justification in the sustainability appraisal for 1000 units at Easton.^{Test of Soundness1} Justification² Justification^{Policy 19: The Hierarchy of Centres}We support this policy - No objection ^{Policy 20: Implementation}Objection¹. The policy is too general and does not provide a detailed Delivery Plan which deals with when infrastructure will be delivered, by whom it will be delivered and accurate costings. 2. There is no detailed timeline indicating key dependencies in terms of individual sites and when the necessary infrastructure will come forward.³. Failure to indicate the commitment of infrastructure partners⁴. Failure to indicate uncertainties in the provision of infrastructure and the consequence and contingencies.^{Test of Soundness1} Effectiveness/^{Justification2} Effectiveness/^{Justification3} Effectiveness⁴ Effectiveness

Joint Core Strategy Proposed submission Document

O - 11408 - 7172 - 07 Implementation and monitoring (POLICY 20) - None

11408 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] Agent: N/A

Full Text:

Summary:

Sustainability Appraisal Not compliant. Although the SA highlights that major growth located close to a NDR could result in environmental impacts such as car-based trips, the SA does not consider alternative transport options which would avoid or reduce adverse impacts as required by the SEA Directive. The SA has treated the unsustainable NDR as part of the baseline case and not as an option. Responding to public criticism on this traffic-generating impact of the NDR, the SA Report asserts: "The NDR may encourage car-based trips", but this potential negative effect is uncertain. The SA recommends that, when considering the case for the NDR, it should be possible to assume minimal use of the road by residents of the Growth Area. However, the NDR Major Scheme Business Case (July 2008) shows high traffic growth on a number of road links across the Norwich Area as a result of the NDR Preferred Option, with substantial growth on radial roads in north-east Norwich and an increase in carbon dioxide emissions compared to Do-Minimum. Norfolk County Council has programmed construction of the NDR in 2014-15, whilst sustainable transport measures, including a bus rapid transit system, are not programmed for completion until 2025. There is a strong danger that people will get into the habit of using their cars if a NDR goes ahead. Local experience has shown the difficulty of transferring orbital car-based journeys to sustainable modes.

Joint Core Strategy Proposed submission Document

O - 11423 - 7172 - 07 Implementation and monitoring (POLICY 20) - None

11423 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary:

Not legally compliant with RSS Norwich Policy NR1 which seeks to: 'achieve a major shift in emphasis across the Norwich Policy Area towards travel by public transport, cycling and walking.' Policy NR1 must also be read alongside wider RSS policies to reduce the region's impact on climate change by locating development so as to reduce the need to travel and effect a major shift in travel away from car use towards public transport, walking and cycling. The GNDP claims that a NDR is in conformity with the RSS because RSS Policy Norwich NR1 refers to 'having regard to the Norwich Area Transportation Study (NATS), which provides a strategy for improving access by all modes of transport across the Norwich Policy Area' and NDR is a key element of NATS. At the time of the RSS EiP in 2005, the NDR project in the Draft East of England Plan was a full orbital route to the north of Norwich, approved as part of NATS in 2005. Norfolk County Council dropped the western section over the River Wensum SSSI/SAC shortly before the EiP and the NDR became a three-quarters road. Depending on the outcome of the Minister's decision on Programme Entry, the NDR could be further reduced in length. The Eastern Daily Press on 11 December 2009 reported that DfT civil servants are recommending Programme Entry for a NDR between A47 Postwick Interchange and A140, but not west of the A140. If accepted, a half route NDR would largely function as a development road for north-east Norwich and not as a full or three-quarters distributor road for north Norwich. Also, the NATS would no longer be predicated on a NDR. In such circumstances, a NDR would not be in conformity with the RSS Policy NR1 as the purpose of the NDR/NATS approved by Norfolk County Council in 2005 would have changed considerably.

Joint Core Strategy Proposed submission Document

O - 11449 - 8513 - 07 Implementation and monitoring (POLICY 20) - ii

11449 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: Document written by people who seem totally out of touch with the real world and the depth of the current recession which will take up to 10 years before we see a recovery and 30 years before we reduce the debt. Where is the money coming from for these grandiose schemes.

Joint Core Strategy Proposed submission Document

O - 11450 - 8513 - 07 Implementation and monitoring (POLICY 20) - None

11450 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: No reference made to the poor consultation or the large amount of objections. To say that people have been consulted is totally wrong.

Joint Core Strategy Proposed submission Document

O - 11453 - 8513 - 07 Implementation and monitoring (POLICY 20) - ii

11453 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: No mention made that a new wing will have to built at the Norfolk & Norwich University Hospital BEFORE any of the house building can start. They are on Black alert most of time now.

Joint Core Strategy Proposed submission Document

S - 11475 - 934 - 07 Implementation and monitoring (POLICY 20) - None

11475 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

We are pleased to note the inclusion of the following wording under this policy: 'It is not the intention of this JCS to permit housing growth to outstrip and be developed in advance of supporting employment and a full range of hard and soft infrastructure' (page 93). However, we would advise that without the full range of hard and soft infrastructure required, we consider that the plan would be found to be unsound under examination. We also welcome the provision for review of the whole strategy (page 94), should a critical shortfall in implementing the requisite infrastructure be identified.

Joint Core Strategy Proposed submission Document

O - 11549 - 8597 - 07 Implementation and monitoring (POLICY 20) - ii

11549 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Blue Living [8597]

Agent: Bidwells Norwich (309) (Mr Ray Houghton) [4029]

Full Text:

Summary:

Blue Living contends that Policy 20 fails the EFFECTIVE soundness test because it does not sufficiently demonstrate how the strategy will be delivered. It is far too vague and provides no certainty of delivery of the infrastructure need to support growth. It also fails to demonstrate how levels of growth proposed are sufficient to fund the expected infrastructure and other policy requirements. The GNDD knows the scale of infrastructure required, and it should be setting out in the implementation section the types of frameworks within which mechanisms for delivering it can come forward without restricting the ability of markets, companies and organisations to respond flexibly, particularly in the current market conditions, which may take time to recover. The EDAW study helps to demonstrate that it is unlikely to be delivered using the existing S106 mechanism, as it leaves insufficient land values. Therefore more innovative delivery mechanisms are required and exploited so that sustainable development can occur. The section also fails the EFFECTIVE soundness test because it is clear that there is no contingency plan or inherent flexibility to respond to changes in the development market. For example, there is no 'Plan B' to take account of a delay or non-delivery of the Northern Distributor Road. Also it provides no advice on flexibility to take account of changes in the housing market and land values. Policy 20 should identify a contingency planning regime and indicate the triggers for its implementation. The GNDD needs to show that it has actively considered how the anticipated limited funds from both the public and private sectors can be combined to prioritise the delivery of necessary infrastructure. It is the view of Blue Living that there has been insufficient emphasis in development 'delivery modes' which could provide necessary infrastructure at nil cost to the development. Policy 20 makes reference to an area-wide tariff and Section 106 contributions to delivery, however Blue Living considers that such mechanism will not be sufficient to bridge funding gaps that have already been identified. Given the limitations that are likely to be imposed on the public purse, Blue Living believed that a more co-ordinated approach where councils take direct equity interest in a site is a more realistic method of delivery. In essence, Blue Living considers there should be a collective approach based on close working rather than imposed control in order to determine agreed parameters. This will allow a shared and responsible approach to sustainable development to come forward which is able to consider developer contributions and funding mechanisms which build on existing arrangements but are not restricted by them.

Joint Core Strategy Proposed submission Document

S - 11550 - 7060 - 07 Implementation and monitoring (POLICY 20) - None

11550 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Broadland Community Partnership (Mrs Kathryn de Vries) [7060] Agent: N/A

Full Text:

Summary: Broadland Community Partnership support the GNDP's view that the pre-submission consultation document is legal and sound. We do have concerns over implementation (funding). The JCS's success will be measured through its ability to ensure appropriate implementation on the ground. Funding for infrastructure is crucial. The Joint Core Strategy sets out a mechanism and approach to addressing the shortfall in funding. The GNDP will need to be constantly in touch, individually and collectively, with delivery partners to ensure that each organisation is aware of the funding deficit and the need to be alert for opportunities to draw down additional funding if implementation is to be successfully achieved.

Joint Core Strategy Proposed submission Document

S - 11552 - 7060 - 07 Implementation and monitoring (POLICY 20) - None

11552 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Broadland Community Partnership (Mrs Kathryn de Vries) [7060] Agent: N/A

Full Text:

Summary:

We would support the GNDP's view that the pre-submission consultation document is legal and sound. Our continuing concerns are that once development is complete the true measure of the success of the Joint Core Strategy will be via an audit of the communities living in the area. Their cohesiveness, their commitment to sustainable living, their increased capacity to support each other and the vulnerable members of their community, will be the means of recording if the growth implementation plan has worked. We would urge the GNDP not to underestimate the importance of ongoing engagement with the general public: with delivery partners: with non-delivery partners, to ensure that the widest possible engagement takes place across the development and delivery of growth. Please do allow 12 weeks for all consultations with the public and with community bodies - I appreciate planning regulations specify a shorter time limit - but any commitment to community engagement requires the longer consultation period.

Joint Core Strategy Proposed submission Document

S - 11568 - 7463 - 07 Implementation and monitoring (POLICY 20) - ii

11568 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: GO East (Ms Mary Marston) [7463]

Agent: N/A

Full Text:

Summary: Policy 20 - Implementation and Monitoring 15. We welcome the inclusion of a delivery and monitoring framework setting out how, when and by whom the Core Strategy's vision, objectives, spatial strategy and policies will be delivered. We note that some of the key dependencies for the 'growth triangle' listed in Policy 10 are not itemised in the Implementation Framework, notably safe pedestrian and cycle links; NDR 'permeability'; and a rail halt at Broadland Business Park. We would simply draw your attention to these omissions.16. The scale of funding is such that the deliverability of projects timetabled for delivery post 2016 - and in a number of cases, post 2021 - will need to be kept under review. We would encourage the Partnership to continue to refine information around delivery dates and the implications of critical infrastructure for phasing.

Joint Core Strategy Proposed submission Document

O - 11575 - 8018 - 07 Implementation and monitoring (POLICY 20) - ii

11575 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Norwich Green Party (Mr Stephen Little) [8018] Agent: N/A

Full Text:

Summary: 4. Other concerns in respect of delivering the strategy:4a PPS12 4.46 concerns the need for flexibility in a strategy. One such uncertainty over the next few years is the level of public funding likely to be available which means that producing low cost alternatives to, for instance, the NDR or the relocation of three secondary schools is particularly important.4b Many of the suggested public transport improvements have not been thought through. For instance, one of the suggestions for the 'innovative use of local network' was the introduction of tram trains. Yet, train operators have barely been consulted on this idea and there has been little floatation of the possibility of extending tracks into more central urban areas which would make the exercise a truly worthwhile one.4c 5.48 in the strategy talks of 'high quality rapid bus services' yet, without Quality Bus Contracts between the council and operators, the power of the council to improve services is very limited.

Joint Core Strategy Proposed submission Document

S - 11589 - 8591 - 07 Implementation and monitoring (POLICY 20) - None

11589 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We acknowledge the comment at Policy 20 that a co-ordinated approach will be taken to the timely provision of infrastructure, services and facilities to support development. We recognise that implementation of the JCS will depend on the co-ordinated activities of a number of agencies and it is essential that necessary infrastructure is provided in a timely manner related to the needs of new development. We have raised concerns regarding the soundness of the wording of paragraph 6.18 of the PSD in the context of the funding and delivery of the proposed Long Stratton bypass. The JCS should be predicted upon the premise that new housing and employment growth will be constructed in parallel with the provision of related infrastructure. There will be a need for all parties concerned to establish an appropriate phasing mechanism to deliver the underlying principle of securing attractive, sustainable communities, ensuring that residents of new development do not form patterns of behaviour which ultimately threaten the viability of new services. We support the observation at paragraph 7.4 of the PSD that the Community Infrastructure Levy will be set at a level "that does not undermine the viability of development." We endorse the proposition at paragraph 7.4 of the PSD.

Joint Core Strategy Proposed submission Document

O - 11594 - 7653 - 07 Implementation and monitoring (POLICY 20) - iii

11594 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Norfolk Constabulary 2659 (Mr Duncan Potter)
[7653]

Agent: NPS Property Consultants Ltd. (Mr Jonathan Green)
[8605]

Full Text:

Summary:

Norfolk Constabulary strongly objects to this policy as there is no specific reference to the police within the range of services listed under infrastructure. Norfolk Constabulary has successfully made representations to a number of LDF Core Strategies seeking specific reference to the Police, which includes the Adopted North Norfolk Core Strategy and the Inspector's Report on the Breckland Core Strategy. It is considered that the approach accepted by North Norfolk District Council and Breckland District Council Planning Inspectors should be taken into account, including as part of the future CIL. Section 6 of the Police Act 1996 places a duty on Police Authorities to secure the maintenance of an efficient and effective Police force for its area under the direction and control of its Chief Constable. Section 17 of the Crime and Disorder Act 1998 provides further relevant guidance and requires the police, in addition to a number of other agencies, to consider crime and disorder reductions and community safety in the exercise of all its duties and activities. A wide variety of development proposals place additional demand for police resources both in terms of need for additional capital investments in new police facilities and funding for additional police officer and police staff. These additional demands on police resources will manifest themselves in a variety of forms and include (1) Additional officers and staff (2) The need to acquire land and capital costs of police building and associated facilities for the provision of new police stations (3) Extend existing police stations (4) Replace temporary and permanent accommodation (5) Provision of new vehicles and other resources to police new developments (6) Extension of existing communication infrastructure; and (7) Crime reduction measures in line with 'Secured by Design' principles. Having regard to the above legislation, it is therefore reasonable for police needs to be taken fully into account by local authorities when determining planning application relating to the provision of new development. Planning Policy Statement 1, The East of England Plan and the ODPM's Safer Places - The Planning System and Crime Prevention demonstrate a clear need to create safe environments which minimise the opportunities for crime. The police authorities, including Norfolk Constabulary, have a key role to play in meeting this objective. Circular 05/2005 'Planning Obligations' Provides Central Government advice of planning obligations under Section 106 of the Town and Country Planning Act as substituted by the Planning and Compensation Act 1991. This guidance states that the aim of planning obligation is to make acceptable development which would otherwise be unacceptable in planning terms. It states that planning obligations can be used to mitigate a development's impact. Most forms of major development will increase the demand for policing and it is reasonable to seek contributions from developers to mitigate this impact. Extracts from both the North Norfolk Core Strategy and Breckland Inspector's Report which make specific reference to the need to the Police are attached.

Joint Core Strategy Proposed submission Document

O - 11603 - 8203 - 07 Implementation and monitoring (POLICY 20) - i, ii

11603 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Country & Metropolitan Homes - formerly
Gladedale (Anglia) Ltd. [8203]

Agent: Bidwells Norwich (309) (Mr James Alflatt) [8204]

Full Text:

Summary:

C&M Homes opinion is that Policy 20 has failed the Justified and Effective tests of soundness, because the fundamental issue with the strategy is its lack of delivery. The strategy of dispersing growth in South Norfolk has potentially rendered certain of the other settlement proposals financially unviable. The strategy is not underpinned by robust and credible evidence 'Justified' nor is it at this stage deliverable 'effective'. Appendix 6 and 7 of the JCS suggests that major investment is required in strategic infrastructure to deliver development in the named strategic locations with some indications being that annual delivery rates would suggest in settlements like Hethersett delivery of strategic growth is unlikely to occur before 2014. Coupled with this is the added uncertainty that many of the strategic infrastructure providers do not have this scale of improvement currently programmed. Particularly in the case of the water industry the next round of their Asset Management Plan (AMP) process is for the period beyond 2015. This delay in enabling infrastructure could inhibit delivery in these strategic locations. However C&M Homes concludes that with the ever decreasing deliverable housing land supply across the Greater Norwich area, with the proposed allocation of 1800 units across 'smaller South Norfolk sites' within the NPA (including possible additions to strategic locations) it is suggested that an early release of a small scale of development in locations like Hethersett could be delivered within existing environmental and infrastructure constraints within a short to medium term. This could assist in 'bridging the gap' in housing delivery in some of these locations in advance of delivering the strategic growth identified. In the case of the land available at Great Melton Road, Hethersett, delivery of up to 200 units could commence, subject to Planning consent as early as 2011.

Joint Core Strategy Proposed submission Document

O - 11617 - 8127 - 07 Implementation and monitoring (POLICY 20) - i

11617 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Swannington with Alderford & Little Witchingham **Agent:** N/A
Parish Council (Mr Steve Griggs) [8127]

Full Text:

Summary: Whatever strategy is adopted, the infrastructure must be put in place to support it. All roads lead to Norwich like the hub of a wheel in the country. The main arterial routes are already overloaded and will be hard-pressed to cope with any increase in traffic. The rail link is limited in capacity at peak periods and is somewhat unreliable. The NHS and education facilities will be equally stretched if significant investment is not made in time.

Joint Core Strategy Proposed submission Document

O - 11618 - 953 - 07 Implementation and monitoring (POLICY 20) - ii

11618 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Norfolk Wildlife Trust (Mr John Hiskett) [953]

Agent: N/A

Full Text:

Summary:

We believe that the document clearly sets out the environmental challenges that will need to be overcome if growth is to be sustainable and includes policies that are relevant to this challenge. We are aware that others who have been closely involved with the water cycle study will comment on those aspects and have decided to concentrate our comments on those aspects pertaining to the provision of green infrastructure, with which we have had close involvement. We are concerned regarding the effectiveness of this area of the plan and we believe the inspector should give close examination as to whether the Core Strategy adequately fulfils the criteria for soundness in relation to the deliverability of green infrastructure. The reasons why we believe that the strategy may be unsound in this area are set out below: A Greater Norwich Green Infrastructure Strategy is included as one of the evidence related documents and following on from this a Greater Norwich Green Infrastructure Delivery Plan has been produced. The importance of Green Infrastructure is outlined in Policy 1 of the Core Strategy and further in paragraph 5.5 which states that: "Investment and development will provide a multi-functional network of greenspaces and green links, having regard to factors such as accessibility, existing and potential open spaces, natural and semi-natural areas, protection of the water environment, landscape, geodiversity and the fundamental need to contribute to ecological networks. More detailed delivery of green infrastructure will be taken forward through delivery plans and other elements of LDFs" We recognise that a great deal of work has taken place and a detailed evidence base has been provided in relation to green infrastructure. However, in our view the plan is at risk of failing in the delivery of green infrastructure both in adequately identifying funding and in the ability to deliver. Green infrastructure funding: Although we recognise that some of the funding for delivery will come through planning agreements and other sources, no strategic funding has currently been identified for green infrastructure in this plan (pg 133). We are aware of LDFs where a tariff per household has been identified in order to pay for green infrastructure that does not relate directly to individual development sites and we would like to see this option explored. We understand that such a tariff exists in the adopted Mid Bedfordshire Planning Obligations DPD and has been proposed in the Thetford Area Action Plan. Ability to deliver green infrastructure: PPS 12 states that "evidence should cover who will provide (green) infrastructure and when it will be provided" In our view, whilst the Greater Norwich Green Infrastructure Delivery Plan identifies and prioritises potential projects and indicates potential partners, there is no firm indication of where and when green infrastructure will be provided and no evidence of "Delivery Partners who are signed up" (re. second effectiveness bullet point of Guidance Notes to Accompany the Representation form) to deliver green infrastructure. For this reason we do not believe that the Core Strategy will be able to effectively deliver green infrastructure in its present form. The GNDP has indicated in Policy 20 that it will not be able to take forward the Core Strategy if infrastructure is not planned and adequately funded. Within this policy it states that 'It is not the intention of this JCS to permit housing growth to outstrip and be developed in advance of supporting employment and a full range of hard and soft infrastructure' (page 93). Whilst the GNDP has publicly made clear that this is the case for transport infrastructure, in our view, it should also be made clear that this relates to all infrastructures including green infrastructure.

Joint Core Strategy Proposed submission Document

S - 11639 - 7523 - 07 Implementation and monitoring (POLICY 20) - None

11639 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] Agent: N/A

Full Text:

Summary: The implementation framework sets out an impressive and clearly evidenced framework of identified infrastructure needs.

Joint Core Strategy Proposed submission Document

O - 11661 - 8366 - 07 Implementation and monitoring (POLICY 20) - i, ii

11661 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Broadland Land Trust [8366]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text: Previously the Broadland Land Trust submitted representations to the regulation 25 consultation, which set out the BLT's position and approach to delivering a sustainable urban extension in line with the principles of sustainable urbanism and walkable neighbourhoods. Unless stated otherwise below, the BLT would like these to be considered by the Inspector appointed to undertake the examination of the Core Strategy.

Summary: Please see attached representations Policy 19 (Previously Policy 12) The Hierarchy of Centres It is noted that new district centres/high streets to be established within the Old Catton, Rackheath, Thorpe St Andrew growth triangle has been moved up to number 3 on in the hierarchy of town centres. This is supported by the BLT and we withdraw our previous objection in this regard. Policy 20 (Previously Policy 19) Implementation Although the BLT broadly support the GNPs Implementation strategy, there is concern that the way in which the policy is structured, it implies that funding for the provision and on-going maintenance of infrastructure, services and facilities will primarily be sourced from developers. It is considered that maximising funding and investment from relevant public and private sector delivery agencies to secure the provision of key services should be the priority rather than a reliance on the development industry. The BLT do not support the imposition of an area-wide CIL on the basis that no information has been provided or discussions held with the BLT to relay how and the mechanisms by which this will be applied. The BLT have concerns how the CIL will be applied to phased developments, and the impact that it will have on the viability of schemes (particularly in the light of volatile market conditions). On this basis, we consider that this part of the policy is not effective. We broadly support the suggestion noted elsewhere that other mechanisms such as a tax increment funding (TIF) should be investigated for large scale strategic infrastructure, to fairly spread the burden of cost between new development and existing businesses or land and property owners who stand to benefit from the improved infrastructure provision. BLT broadly support the intent to maximise available mainstream and grant funding and look forward to the establishment of joint public/private delivery mechanisms to ensure co-ordination, maximisation of available resources and innovative delivery mechanisms targeted at unlocking development. BLT highlight the fact that they would welcome the opportunity of early dialogue with the GNP around how innovative public/private delivery mechanisms might be put in place to unlock project delivery, particularly in the present financial climate.

Joint Core Strategy Proposed submission Document

O - 11675 - 8511 - 07 Implementation and monitoring (POLICY 20) - i, ii, iii

11675 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: The Fairfield Partnership [8511]

Agent: JB Planning Associates (Mr Tim Waller) [8510]

Full Text:

Summary:

It will not be possible to deliver all of the infrastructure which the Core Strategy envisages. Paragraph 7.4 notes that 'Studies show that the cost of required infrastructure is likely to exceed expected income from all sources.' It is therefore necessary to set out the relative priorities for development, so as to best ensure the Core Strategy's Objectives and Vision can be realised. While paragraph 7.2 suggests that the GNDP will manage the prioritisation and management of infrastructure through an Integrated Development Programme, we feel that the Core Strategy should provide additional guidance for this process. It appears that some elements of infrastructure are more important and generally beneficial than others. For instance, the proposed Bus Rapid Transit service between Wymondham and Norwich would serve a great many people, and would make a significant contribution towards achieving a modal shift away from private car use. In contrast, the proposed Long Stratton bypass would deliver only local benefits, and would result in an increase in traffic, both by doubling the size of the village, and the number of car drivers, and by making the A140 more attractive for non-essential journeys. The Core Strategy should prioritise different developments, depending on their importance to the strategy as a whole, and the likelihood of delivering the necessary infrastructure. The current implication that a greater number of developments will be progressed than can be funded is unsound, as it clearly cannot be delivered. Paragraph 7.11 notes that: 'Every effort will be made to ensure appropriate and timely supporting infrastructure is delivered. In the event of a critical shortfall, the Joint Core Strategy will be reviewed.' The inevitable conclusion is that, if it remained unaltered, a review of the Core Strategy would be required early in the plan period, once it becomes apparent that only some of the proposed development could be delivered. The Core Strategy is therefore unsound because it is not effective or deliverable.

Joint Core Strategy Proposed submission Document

S - 11706 - 8363 - 07 Implementation and monitoring (POLICY 20) - None

11706 Support

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary:

We acknowledge the comment at Policy 20 that a co-ordinated approach will be taken to the timely provision of infrastructure, services and facilities to support development. We recognise that implementation of the JCS will depend on the co-coordinated activities of a number of agencies and it is essential that necessary infrastructure is provided in a timely manner related to the needs of new development. There will be a need for all parties concerned to establish an appropriate phasing mechanism to deliver the underlying principle of securing attractive, sustainable communities, ensuring that residents of new development do not form patterns of behaviour which ultimately threaten the viability of new services. We support the observation at para 7.4 of the PSD. We endorse the proposition at para 7.4 of the PSD.

Joint Core Strategy Proposed submission Document

O - 11722 - 8618 - 07 Implementation and monitoring (POLICY 20) - i, ii

11722 Object

CHAPTER 7 07 Implementation and monitoring (POLICY 20)

Respondent: M P Kemp Ltd [8618]

Agent: Mr Christopher Marsden [8619]

Full Text:

Summary:

Policy 20: ImplementationOur comments in respect of Policy 20 reiterate what we have set out previously and what was indicated in the PINS Report of February 2009. There is no evidence to show that all infrastructure providers agree that there is a reasonable prospect that crucial components of infrastructure can be provided at the appropriate time. As at the time of the PINS report, there is little information on when, during the plan period, the various growth locations are expected to be implemented. The implementation policy, as currently drafted is more a hope that necessary infrastructure will be delivered in time and in that respect the Proposed Submission document is unable to provide the necessary degree of assurance that its proposals can be delivered. There are therefore no delivery mechanisms or timescales for implementation of the policies. Further evidence that the DPD is unsound appears in paragraph 7.11. This indicates clearly that the plan is not flexible enough to respond to a variety of unexpected changes in circumstances. Its response to the non-delivery of critical infrastructure is to promote a review. This proves beyond doubt that no reasonable alternatives have been considered to which the plan could adapt in the event such circumstances were to occur. The proposed submission document is unsound.

Joint Core Strategy Proposed submission Document

O - 11302 - 8260 - Appendix 1: Relationships to other Strategies - None

11302 Object

CHAPTER 8 Appendix 1: Relationships to other Strategies

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary: Appendix 1, p97, County Strategies. We anticipate that the new Norfolk Geodiversity Action Plan will be launched in spring 2010. We can supply a very advanced draft now and the GAP will be active for the term of this document. I suggest that this plan is included.

Joint Core Strategy Proposed submission Document

O - 11170 - 8481 - Appendix 2: Supporting documents - i, ii

11170 Object

CHAPTER 8 Appendix 2: Supporting documents

Respondent: Broads Authority (Ms Andrea Long) [8481]

Agent: N/A

Full Text:

Water Cycle Study: The draft AA for the JCS highlights issues around water e.g. quality, quantity and disposal. Environmental and capacity improvements are required to several sewage treatment works to provide capacity and new licences will be required to permit more extraction from the River Wensum at Costessey. In the absence of these licences, the existing planned development in the JCS would not be able to proceed. In relation to abstraction the Broads Authority would have concerns about future abstraction from already stressed resources. The final Water Cycle Study for the JCS is still to be finalised however, it does reveal some concerns. Strategic Interceptor Sewers to the north and south of Norwich are required to serve the proposed strategy. Failure to provide this will prevent development from taking place. There is limited sewer capacity which means that development would not be able to proceed until the new trunk sewer to the south is provided in 2020. Other than that served by local works the bulk of the development of Norwich will be served at Whitlingham. This will require qualitative improvements phased in from 2015 onwards. This will also require revised consents from the Environment Agency and development will only be able to proceed once these are in place. The water cycle work to date raises questions over water quality and the ability to comply with European Water Framework Directive targets and importantly those relating to phosphorus discharge levels into receiving water bodies such as the Broads. This issue does need firm resolution before the JCS is submitted although the Water Cycle Study to date would appear to indicate that some of the solutions may be beyond current best available technology. The Broads Authority would be happy to work in partnership with others to look for solutions to these issues and suggests that rolling out the current work being undertaken on water for the Eco town at Rackheath across the wider JCS area may go some way to addressing the issue. The Broads Authority has over the last two decades invested considerable effort into improving the water quality of the Broads and would not wish to see this lost.

Summary:

The Water Cycle Study is currently incomplete, however it does raise issues over water supply, quantity and discharge. This piece of work needs completing before the JCS can be submitted. Moreover it needs to be clear about how the required water infrastructure and associated solutions can be delivered. Currently there is no certainty

Joint Core Strategy Proposed submission Document

O - 11171 - 8481 - Appendix 2: Supporting documents - i, ii

11171 Object

CHAPTER 8 Appendix 2: Supporting documents

Respondent: Broads Authority (Ms Andrea Long) [8481]

Agent: N/A

Full Text:

Appropriate Assessment: The Broads contains globally significant wetlands and their importance should not be underestimated. As outlined earlier the issues presented by the growth in relation to water supply and quality also impact upon the designated sites habitats and species. The JCS Appropriate Assessment does outline a number of measures that are designed to prevent harmful impacts on protected sites in the Broads. The AA concludes that there are no direct or indirect impacts are anticipated from the implementation of the JCS alone provided that there is compliance with Water Framework Directive Targets and other measures are implemented., However without the completed Water Cycle Study and some solutions to the issues highlighted in the Water Section earlier in this report is difficult to see how the Appropriate Assessment can confidently predict no adverse effects. Indeed the AA itself concludes that currently there is insufficient information regarding in-combination and cumulative impacts to be able to reasonably assess whether the impacts could be significant or not and further assessment should be undertaken.

Summary:

The Broads Authority has concerns that the AA requires further research to examine cumulative and in combination effects on european sites. This work has not yet been undertaken and therefore the effects are not yet known. With the current published informaiton around water issues. It is unclear how the AA can conclude that there are no significant effects posed by teh JCS on euopean sites

Joint Core Strategy Proposed submission Document

S - 11159 - 6339 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11159 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr Hayter [6339]

Agent: N/A

Full Text:

Summary: Proposals maps legally compliant and sound

Joint Core Strategy Proposed submission Document

O - 11384 - 8595 - Appendix 3: Superceded policies and changes to local plan proposals maps - ii

11384 Object

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr Charles Birch (Trustees of the Gurloque Settlement, et al) [8595]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

Land at Cringleford can accommodate new housing and employment, thereby creating a distinctive gateway on the strategically significant approach to the centre of Norwich along the A11 corridor. It can contribute towards the achievement of a sound spatial strategy. Land either side of the A11 at Cringleford can make a meaningful contribution to the delivery of the new employment and housing required in the Norwich area by virtue of Policy NR1 of the East of England Plan. The creation of a high quality entrance to the Norwich urban area will provide a positive response to Policy 12 of the PSD which seeks an improvement to the "gateways" to Norwich. Our clients agree with the comment at paragraph 13.68 of the East of England Plan to the effect that the Norwich area has the potential to develop further as a major focus for long term economic development and growth. In the light of this policy perspective, it is important to ensure that the Joint Core Strategy provides a robust and flexible spatial strategy, capable of realising the potential of the Norwich area in the period to 2026 and beyond. The JCS should secure the base from which the necessary step-change in economic and housing delivery is achieved in the short/medium term whilst identifying a sound spatial policy framework for the longer term. The key Diagram and Proposals Map extract no. 2 could be interpreted to restrict growth at Cringleford to the area north of the A11. Whilst Map Extract No 2 states that the growth locations do not represent precise sites which remain to be defined, there is a concern that the Key Diagram may be construed as promoting growth at Cringleford only to the north of Newmarket Road.

Joint Core Strategy Proposed submission Document

S - 11448 - 8587 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11448 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re Thorpe End 19support for changes to proposals Map for JCS

Joint Core Strategy Proposed submission Document

S - 11454 - 8587 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11454 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re Rackheath (34)Support for changes to Proposals Map for JCS

Joint Core Strategy Proposed submission Document

S - 11456 - 8587 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11456 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re Sprowston (41E)Support for changes to proposals map for JCS

Joint Core Strategy Proposed submission Document

S - 11457 - 8587 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11457 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re Thorpe St Andrew (44A)Support for changes to proposals map for JCS

Joint Core Strategy Proposed submission Document

S - 11458 - 8587 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11458 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr John Faircloth [8587]

Agent: Mr Colin Finlayson [8492]

Full Text:

Summary: Re Ammended Proposals District View P3support for changes to proposals map for JCS

Joint Core Strategy Proposed submission Document

S - 11593 - 8591 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11593 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We have noted the content of Map Extract No.5 which identifies the route of the proposed Long Stratton bypass to the east of the existing built up area. We consider that an alignment to the east of the settlement provides the greatest benefits. We note that Map Extract No.5 identifies a "proposed major growth locations requiring an Area Action Plan" notation at Long Stratton. This proposition should have a clear reference within the text of the JCS and we would suggest that an addition be made to paragraph 6.13 of the PSD which describes the necessity of undertaking a "whole settlement" approach to the growth of Long Stratton.

Joint Core Strategy Proposed submission Document

S - 11595 - 8591 - Appendix 3: Superceded policies and changes to local plan proposals maps - None

11595 Support

CHAPTER 8 Appendix 3: Superceded policies and changes to local plan proposals maps

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: We support the identification of Long Stratton as a location for "Major Housing Growth and Associated Facilities." Furthermore, we endorse the identification of an alignment for the Long Stratton bypass to the east of the present A140. We have noted that the Key Diagram defines Long Stratton as a Key Services Centre. It would be helpful if the JCS could indicate that Long Stratton will, in due course, be viewed as a Main Town in the light of its identification within Policies 9 and 10 of the PSD as a preferred/sustainable location for strategic growth.

Joint Core Strategy Proposed submission Document

O - 11724 - 8363 - Appendix 3: Superseded policies and changes to local plan proposals maps - ii

11724 Object

CHAPTER 8 Appendix 3: Superseded policies and changes to local plan proposals maps

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary: MAP Extract No. 2 Map Extract No. 2 of the Proposals Map describes Easton/Costessey as "other proposed major growth location". Our clients endorse this categorisation as they believe that Costessey constitutes an extremely sustainable location to accommodate new development at the edge of Norwich. Whilst Map Extract No. 2 states that "the above locations do not represent precise sites which remain to be defined", our clients are fearful that the disposition of the notation on the Proposals Map will be taken as an indication that the new housing is expected to be located to the north of the A47 at Longwater. Greater clarity is required to ensure that any potential misinterpretation does not arise in the formulation of future DPDs. Policies 9 and 10 of the PSD refer to the provision of at least 1000 dwellings at Easton/Costessey. We consider that these two locations exhibit different spatial policy credentials and should not reasonably be considered together in the JCS. Costessey is part of the urban area of Norwich and is specifically named as an urban fringe parish in Policy 12. Easton is physically separate from Norwich and is not described as an urban fringe parish. Policies 9 and 10 of the PSD should place the emphasis upon Costessey, not Easton, as a sustainable location for the further growth. Our clients support the identification of Costessey as a growth area as shown on the plan at Page 69 of the Public Consultation: Regulation 25 (March 2009) and contend that the land between the A 47 and the edge of Norwich is more appropriate in spatial policy terms than Easton which is physically distinct from the city's built-up area. The PSD is unsound in that it exhibits an inconsistent approach to the context of the Key Diagram and the proposals Map. Map Extract No. 2 shows three asterisks identifying a proposed growth location north of the A47, near the River Tud, whilst the Key Diagram displays a major housing growth notation to the south of the A47, close to Easton / Bawburgh.

Joint Core Strategy Proposed submission Document

S - 11180 - 7620 - Appendix 4: Definition of the Norwich Policy Area - None

11180 Support

CHAPTER 8 Appendix 4: Definition of the Norwich Policy Area

Respondent: IE Homes & Property Ltd (Mr Ed Palmieri) [7620] **Agent:** N/A

Full Text: support

Summary: support

Joint Core Strategy Proposed submission Document

O - 11502 - 8589 - Appendix 4: Definition of the Norwich Policy Area - i

11502 Object

CHAPTER 8 Appendix 4: Definition of the Norwich Policy Area

Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary: Village plans and other local plans drawn up by local communities are to be ignored or superseded. The inclusion of Salhouse in the Norwich Planning Area and thereby a service village will subject us to additional planning demands beyond those which might be generated locally. This seems to be the imposition of lifestyle by the planners and is implicit in the strategy.

Joint Core Strategy Proposed submission Document

S - 11590 - 8591 - Appendix 4: Definition of the Norwich Policy Area - None

11590 Support

CHAPTER 8 Appendix 4: Definition of the Norwich Policy Area

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: We acknowledge and support the definition of the extent of the NPA to be found at Appendix 4. We would note that Long Stratton clearly falls within the defined extent of the NPA.

Joint Core Strategy Proposed submission Document

O - 11174 - 8320 - Appendix 6: Housing trajectory - i, ii, iii

11174 Object

CHAPTER 8 Appendix 6: Housing trajectory

Respondent: Sunguard Homes [8320]

Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text: This representation is made on behalf of Sunguard and concerns the housing trajectory for Long Stratton in Appendix 6. Norfolk County Council Department of Planning and Transportation has confirmed that that approximately 150 dwellings can be built at the Sunguard site off Chequers Road, Tharston before a bypass is constructed provided further improvements are made to the signals on the A140 originally installed in 2000 in connection with the previous phase of development at Jermyn Way. The housing numbers table referring to Long Stratton should therefore be brought forward to 2010/11 and also make reference to Chequers Road, Tharston.

Summary: This representation is made on behalf of Sunguard and concerns the housing trajectory for Long Stratton in Appendix 6. Norfolk County Council Department of Planning and Transportation has confirmed that that approximately 150 dwellings can be built at the Sunguard site off Chequers Road, Tharston before a bypass is constructed provided further improvements are made to the signals on the A140 originally installed in 2000 in connection with the previous phase of development at Jermyn Way. The housing numbers table referring to Long Stratton should therefore be brought forward to 2010/11 and also make reference to Chequers Road, Tharston.

Joint Core Strategy Proposed submission Document

O - 11252 - 8547 - Appendix 6: Housing trajectory - i, ii, iii

11252 Object

CHAPTER 8 Appendix 6: Housing trajectory

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: The housing trajectory identifies a shortfall against the cumulative allocation until 2015/16. Development at Easton/Cottessey is identified as delivering new homes in 2014/15. There is no reason why development here cannot commence sooner with first completions in 2012/13. Indeed, given the shortfall in housing and urgent need to increase supply bringing forward Easton as a growth location should be a priority.

Summary: The housing trajectory identifies a shortfall against the cumulative allocation until 2015/16. Development at Easton/Cottessey is identified as delivering new homes in 2014/15. There is no reason why development here cannot commence sooner with first completions in 2012/13. Indeed, given the shortfall in housing and urgent need to increase supply bringing forward Easton as a growth location should be a priority.

Joint Core Strategy Proposed submission Document

O - 11506 - 8057 - Appendix 6: Housing trajectory - i

11506 Object

CHAPTER 8 Appendix 6: Housing trajectory

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

Appendix 6 GNDP Annual Delivery Rates for 2015/16The Highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road.The Highways Agency role in the preparation of Local Development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will exopect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11592 - 8591 - Appendix 6: Housing trajectory - None

11592 Object

CHAPTER 8 Appendix 6: Housing trajectory

Respondent: Mr Andrew Leeder [8591]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

The housing trajectory is unsound as it assumes that development at Long Stratton will not commence until 2017/18. The provision of a bypass at Long Stratton is considered to be extremely important by the local community and it would be inappropriate, as a matter of policy, to seek to prevent the implementation of this substantive element of new infrastructure until 2017/18. The PSD acknowledges the fact that Long Stratton represents a sustainable location to accommodate further growth, given the present level of services and facilities. The environmental quality evident at the settlement will be substantially enhanced once a bypass is provided and the achievement of a sound Core Strategy will not be undermined if work commences sooner than 2017/18 at Long Stratton which assists in the delivery of the substantial local environmental benefits associated with the construction of a bypass to the east of the settlement.

Joint Core Strategy Proposed submission Document

O - 11707 - 8363 - Appendix 6: Housing trajectory - i, ii

11707 Object

CHAPTER 8 Appendix 6: Housing trajectory

Respondent: Taylor Wimpey Developments & Hopkins Homes **Agent:** Pegasus Planning Group (Mr John Holden) [4250]
[8363]

Full Text:

Summary: The Topic Paper entitled "Strategy to Accommodate Major Housing Growth in the Norwich Policy Area" states that the options for large-scale growth to the west of the city "are focussed on extensions to Lodge Farm/Bowthorpe and at Easton." Furthermore, the Topic Paper acknowledges that the only potential urban extension related to Norwich in the South Norfolk sector of the NPA arises at Costessey. Our clients are presently developing new housing at Lodge Farm and consider that a key component of their input to the JCS is the ability of this location to produce housing completions at an early stage in the implementation of the JCS. Given that our clients are presently undertaking development at Lodge Farm, they object to the housing trajectory: growth locations which indicates that dwelling completions are expected to arise on the proposed Costessey urban extension in 2014/2015. In the light if the progress being made at the existing Lodge Farm development area, our clients consider that the suggested phasing would be inappropriate and that the JCS should anticipate an earlier start, enabling a continuing programme evolving from the existing Lodge Farm development area.

Joint Core Strategy Proposed submission Document

O - 11476 - 934 - Appendix 7: Implementation Framework - ii

11476 Object

CHAPTER 8 Appendix 7: Implementation Framework

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

We welcome the inclusion of the strategic green infrastructure map on page 35 of the document, and the strong emphasis throughout on the importance of integrating publicly accessible, multifunctional greenspace into existing and planned housing developments. We note, however, that no funding sources have been identified for the £225m estimated costs (page 133), and would direct you to the comprehensive funding source review appended to the draft Stage 2 report of the King's Lynn Green Infrastructure Study, which provides details of a number of schemes available for supporting green infrastructure projects. We would also strongly urge the GNDP to appoint a GI Officer to co-ordinate funding applications for initiation and long-term secure management, as recommended in the recently published Greater Norwich Green Infrastructure Delivery Plan (August 2009). We consider this to be a high priority in securing the delivery of sustainable growth, and creating an adaptive environment where people and wildlife can successfully co-exist. We would also actively encourage you to include a green infrastructure target in the indicators for spatial planning objective 9 (page 143), potentially around the hectareage of new green infrastructure to be created.

Joint Core Strategy Proposed submission Document

O - 11507 - 8057 - Appendix 7: Implementation Framework - ii

11507 Object

CHAPTER 8 Appendix 7: Implementation Framework

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary: Appendix 7 Implementation Framework
The highways Agency is responsible for managing and operating the trunk road network, which in the vicinity of the Norwich Policy Area is the A47 and A11 trunk roads. accordingly comments made are limited to those matters that may have an impact on the trunk road. The highways Agency role in the preparation of Local development Plans is set out in the DfT Circular 02/2007 Planning and the Strategic Highway Network which states in; Para 21 "its proposals are evidence based and deliverable" and in Para 23 "The development should be promoted at sustainable locations, and "will expect to see demand management measures incorporated in development proposals"

Joint Core Strategy Proposed submission Document

O - 11584 - 7738 - Appendix 7: Implementation Framework - i, ii

11584 Object

CHAPTER 8 Appendix 7: Implementation Framework

Respondent: Anglian Water (Mrs Sue Bull) [7738]

Agent: N/A

Full Text:

Summary:

Appx 7 indicates need for investment at Whitlingham in AMP5. we do not see the capacity of Whitlingham constraining development in teh short term and have no oplans to extend before 2016.The infrastructure report whihc Appx 7 is based on states that water and wtaerways infrastructure will be funded by water company. It is expected that any work to serve new developments will be requisitioned by developers and contributions towards the cost will be payable by developers.Note the Infrastructure Report and Appropriate Assessment contain factual errors.

Joint Core Strategy Proposed submission Document

S - 11640 - 7523 - Appendix 7: Implementation Framework - None

11640 Support

CHAPTER 8 Appendix 7: Implementation Framework

Respondent: East of England Regional Assembly (Ms Helen De La Rue) [7523] **Agent:** N/A

Full Text:

Summary: The implementation framework sets out an impressive and clearly evidenced framework of identified infrastructure needs.

Joint Core Strategy Proposed submission Document

O - 11303 - 8260 - Appendix 8: Monitoring table - None

11303 Object

CHAPTER 8 Appendix 8: Monitoring table

Respondent: Norfolk Geodiversity Partnership (Ms Jenny Gladstone) [8260]

Agent: N/A

Full Text:

Summary:

Appendix 8, Monitoring Framework, Objective 9 p143. This has no geodiversity indicators, nor are they placed anywhere else within the Monitoring Framework. We request that Geodiversity indicators are included within this Monitoring Framework. Until the outlined omissions are made good, we must consider the Proposed Submission Document inadequate for geodiversity.

Joint Core Strategy Proposed submission Document

O - 11362 - 8047 - Appendix 8: Monitoring table - i

11362 Object

CHAPTER 8 Appendix 8: Monitoring table

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary: Appendix 8 fails to show sufficient information in either provisions or cost to demonstrate effectiveness in thought or research to support the document. This document should not be submitted without substantial amendment, and improvement to the information in Appendix 8.

Joint Core Strategy Proposed submission Document

O - 11429 - 905 - Appendix 8: Monitoring table - iii

11429 Object

CHAPTER 8 Appendix 8: Monitoring table

Respondent: English Heritage (Eastern Region) (Ms. Katharine Fletcher) [905] **Agent:** N/A

Full Text:

Summary: Appendices, p 143A single indicator is included for the historic environment relating to the loss of listed buildings. It would be appropriate to incl additional indicators that are likely to be more appropriate for monitoring daily development management decisions

Joint Core Strategy Proposed submission Document

O - 11503 - 8589 - Appendix 8: Monitoring table - ii

11503 Object

CHAPTER 8 Appendix 8: Monitoring table

Respondent: SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589] **Agent:** N/A

Full Text:

Summary: Finally, the cost is over £1,000 million, when uncoded items are taken into account. The costs are in many cases are dismissed as being the responsibility of the provider. What is not stated is that although these costs will not be borne by Councils they will in any case have to be paid by consumers

Joint Core Strategy Proposed submission Document

O - 11563 - 8268 - Appendix 8: Monitoring table - None

11563 Object

CHAPTER 8 Appendix 8: Monitoring table

Respondent: RSPB (East of England Regional Office) (Dr Philip Pearson) [8268] Agent: N/A

Full Text:

Summary:

We are concerned that the published Appropriate Assessment does not appear to be for the latest version of the CS. This is clearly reflected in Table 1.2 of the AA. Policies in the current document have been amended based on the recommendations of the SA. e.g Policy 1 in the AA (promoting sustainability ...)has been amended to 'Addressing climate change.....', whilst policy6 in the AA 'housing delivery' is policy 4 in the most recent CS. In order to comply with the requirements of the Conservation (Natural Habitats, &c.) Regs 1994 as amended and to demonstrate the proposed submission is sound and deliverable it is essential that a thorough AA of the revised Core Strategy is undertaken. Without an up to date AA it is not possible to conclude that the current JCS policies will not adversely affect Natura 2000 sites. We are concerned that the the AA only considers Natura 2000 sites in the Broads. The significant amount of growth planned for the GNDP area is likely to increase visitor numbers to both the North Norfolk Coast SPA and Breckland SPA. these sites have an intrinsic value that will attract visitors from considerable distances and the proposed developments are likely to increase the pressures these sites currently experience. They should not be excluded from a thorough AA of the JCS. The lack of cumulative an in-combination assessment in the document is also concerning. The current AA concludes that 'regarding in-combination and cumulative impacts, there is insufficient information to be able to reasonably assess whether the impacts could be significant or not. therefore it is recommended that further assessments are undertaken' The proposed policies' physical and spatial parameters are clearly outlined in the Core Strategy and the same parameters are established in the LDF documents for adjacent Councils. The broad spatial principles of the development along with the main growth centres are clearly set out up to beyond 2021. We believe that sufficient information exists to predict with reasonable certainty the effects of the proposed policies both alone and in-combination with other plans and projects and should be undertaken in the AA in the current document. Any mitigation solutions identified must be capable of delivery through the planning system or other relevant regulatory systems and if implemented ensure the adverse effect is avoided.

Joint Core Strategy Proposed submission Document

O - 11394 - 6950 - Appendix 9: Glossary - i, ii, iii

11394 Object

CHAPTER 8 Appendix 9: Glossary

Respondent: Costco Wholesale UK Ltd [6950]

Agent: RPS (London office) (Ms Maire McKeogh) [8593]

Full Text:

Summary: costco is a sui generis membership warehouse club created to serve the wholesaling needs of the small to medium size business owner. These reps both support and object to the Employment use definition of the Glossary. Firstly we support the recognition that employment land will be used primarily but not exclusively for B1, B2 and B8 uses. However it is requested that further clarification be provided.