

8 June 2010

Inspector Roy Foster MA MRTPI
c/o Simon Osborn
1 Lower Farm Cottages
Puttock End, Belchamp Walter,
Sudbury, Suffolk CO10 7BA

Dear Inspector,

JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK

Thank you for your note setting out the conclusions from the Exploratory Meeting held on 13 May 2010.

Having reviewed the conclusions the Partnership has put together a programme of work and a timetable to complete it. Should it be required, it is the intention of the Partnership to undertake consultation on a Schedule of Changes to the Joint Core Strategy Submission document from 19 July to 30 August 2010. This, and other associated work will be reported to the GNDP Policy Group on 23 September and will then be presented to Full Council of the District Councils. This would mean that a pre-hearing meeting/ exploratory meeting could be held week commencing 18 October with the hearings commencing on 25 October 2010 (we have checked with the Kings Centre and, at present, the Centre is still available).

The Partnership understands from the Programme Officer that the letter received following the Exploratory Meeting is the only documentation that will be issued from the meeting. We have received a number of requests for a formal minute of the meeting and, as the responses are not recorded in the letter of the meeting, the Partnership is issuing the attached document as evidence of its responses to the Inspectors given at the meeting.

I would like to address one aspect of item 3. Option 2A was a short-lived option being considered at the time of the Pre-Engagement Inspector's visit. It was not subsequently pursued. A significant element of the PE Inspector's concerns were understood to be around the justification for the inclusion of the location to the south of Norwich (Mangreen area) when considered against the reasonable alternatives. This location does not feature in the submitted JCS. While the submitted distribution shares similarities with Option

2A, it is actually a refinement of Options 1 and 2 taking account of a significantly reduced dwelling requirement, ongoing engagement with stakeholders and further evidence. This was then subject to sustainability appraisal, full public consultation and further evidence gathering. The derivation of the submitted distribution is set out in TP 8, Topic Paper: Strategy to Accommodate Major Housing Growth in the Norwich Policy Area, but we will ensure that this is properly clarified.

The Partnership has also written to the Planning Inspectorate (copy letter attached) seeking guidance on how the Inspectorate will advise its Inspectors undertaking Examinations in Public within the forthcoming months following publication of *Coalition: Our Programme for Government* and the letter from the Secretary of State regarding Abolition of Regional Strategies.

The Partnership has reviewed the PINS guidance to steer the further work required and has issued a brief to consultants to undertake an Affordable Housing Study and has prepared briefs for internal work to respond to the further matters raised in your note.

The Partnership is confident it can meet the programme as described above and would submit the additional clarification and evidence sought to you by the end of September. Please can you confirm to the Programme Officer how you wish to proceed as soon as possible to allow us to commit to the venue, and ensure we have sufficient time to submit the public notices required by the regulations.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S Eastaugh'.

Sandra Eastaugh
Greater Norwich Development Partnership Manager

Enclosures: GNDP response to the Inspectors Notes to accompany the
exploratory meeting agenda
Letter to Planning Inspectorate, 8 June 2010

cc.

Rob Middleton, Planning Inspectorate
Simon Osborn, Programme Officer
Mary Marston, Go-East
Michael Hargreaves, Go-East

GNDP – response to Inspector Notes to Accompany the Exploratory Meeting agenda

Infrastructure	
Inspectors questions / notes	GNDP response
<p>Preliminary soundness concerns arise around GNDP’s response to Q1&2 of the Inspectors’ questions to GNDP about whether the JCS adequately defines the degree of criticality of the 80 items of infrastructure identified in Appendix 7. The JCS identifies all of these items as ‘critical’ either to the strategy as a whole or to the delivery of particular named growth locations.</p> <p>On the other hand, the Infrastructure Study (INF1) categorises some costs (eg education at table 6-41, community facilities at table 9-20 and utilities at table 12-7) under different headings ie ‘critical, essential, and desirable’. It is unclear how far the ‘critical’ items in Appendix 7 coincide (or not) with items identified as critical/essential/desirable (or unclassified) in INF1 – or indeed what the precise interrelationship is between the items in the Appendix and those in INF1.</p> <p><u>Can this interrelationship be clarified, and would such clarity require change to the Appendix or any other part of the JCS?</u></p> <p>A potential soundness issue with so many items being identified in Appendix 7 as ‘critical’ is that if the examination were to throw doubt on the timely deliverability of any of these 80 items the soundness of the JCS (either as a whole or in part) could be placed in jeopardy.</p> <p><u>Can the JCS be clearer about the respective degrees of criticality of the items and what the consequences would be (ie the ‘flexibility’ aspect of the ‘effectiveness’ determinant) if any of the items could not be delivered, or were to be delayed in delivery?</u></p> <p style="color: red;">On the other hand, certain documents in the evidence base give mixed messages about this criticality</p> <p>For example, the Infrastructure Study (INF1) categorises some costs (eg education at table 6-41, community facilities at table 9-20 and utilities at table 12-7) under <u>different</u> headings ie ‘critical, essential, and desirable’. It is unclear how far the ‘critical’ items in Appendix 7 coincide (or not) with items identified as critical/essential/desirable (or unclassified) in INF1 – or indeed what the precise interrelationship is between the items in the Appendix and those in INF1. <u>Can this interrelationship be clarified, and would such clarity require change to the Appendix or any other part of the JCS?</u></p>	<p>INF1: The Infrastructure Needs and Funding Study 2009 was commissioned by the GNDP as a consultant led evidence study to inform the Joint Core Strategy (JCS) and to assist in the development of the IDP.</p> <p>The headings ‘critical’, ‘essential’ and ‘desirable’, coined by the consultants for the purposes of that study were not endorsed by the Partnership.</p> <p>In the JCS, the word ‘critical’ does not relate to the definition in the Infrastructure Needs and Funding Study, instead it reflects the infrastructure dependencies to deliver the JCS. This is further explained in TP5: Infrastructure.</p> <p>If during the Examination the Inspector feels it would be helpful to use an alternative heading/description in the JCS Appendix 7, such as ‘dependencies’ other than ‘critical’ this can be explored.</p> <p>The JCS cannot be clearer about delivery at this stage. Paragraph 7.2 on page 93 of the JCS says ‘The delivery vehicle for co-ordination, prioritisation and management, including contributions and funds, is the Greater Norwich Development Partnership (GNDP). The GNDP will develop and manage a delivery programme supporting the implementation of this Joint Core Strategy. The programme will be developed through the Integrated Development Programme (IDP).</p> <p>The first draft of the IDP is being developed; a work-in-progress copy will be presented to the GNDP Policy Group on 27 May 2010 (the next meeting). This draft will be made available to the Inspectors to demonstrate progress on preparing the IDP. However, it is important to recognise that this will be a working document that is continually updated as more certain information becomes available.</p> <p>The IDP will eventually include sections covering all aspects of delivery (as set out in the SQW toolkit) which means sections will be prepared in consultation with service providers, such as Health, Emergency Services, Sports etc. In order to begin these discussions with the service providers an Engagement Strategy was agreed with the GNDP Local Authority leaders in Jan 2010. A series of meetings is being arranged to take place over the next few weeks to begin delivery discussions. The timing and content of these meetings is difficult for all parties as the service providers are seeking assurance on the locations and until the JCS is adopted there are a number of uncertainties that cannot be firmed up.</p>

Another example – doc H1 (Stage 8 of the SHLAA) at 2.10 says that rail improvements at Rackheath are important but not critical to delivering growth, so their implementation is not a constraining factor – contrary to Appendix 7

A potential soundness issue with so many items being identified in Appendix 7 as ‘critical’ is that if the examination were to throw doubt on the timely deliverability of any of these 80 items the soundness of the JCS (either as a whole or in part) could be placed in jeopardy. Can the JCS be clearer about the respective degrees of criticality of the items and **can it say more about** what the consequences would be if any of the infrastructure items could not be delivered, or were to be delayed in delivery? This is important to the flexibility aspect of the ‘effectiveness’ test.

Can there be a clearer link **between infrastructure provision and** the phasing of the various development areas – JCS not much information on the latter??

Affordable Housing (AH)	
Inspectors questions / notes	GNDP response
<p>Preliminary soundness concerns arise around whether the AH-related proposals of the JCS are based on robust and credible evidence meeting the requirement of PPS3 (para 29, bullet 4), that 'Local Planning Authorities will need to undertake an informed assessment of the economic viability of any (proposed) thresholds and proportions of AH...'</p> <p>This requirement is reinforced by the Blythe Valley (BV) judgement of the Court of Appeal. LJ Keene said '<i>...an informed assessment of viability of any such percentage figure is a central feature of the PPS3 policy on affordable housing. It is not peripheral, optional or cosmetic. It is patently a crucial requirement of the policy.</i>'</p> <p>Specific viability testing on the current definition has only been undertaken in the case of the City of Norwich. It has not been undertaken in the case of Broadland and South Norfolk.</p> <p>In the case of Norwich (document H5) the testing covered the 'proportion' (40%) but did not overtly test sites below the proposed 'threshold' of 5, despite this being lower than the national indicative figure of 15. The 6 sites appraised in the Drivers Jonas study were all larger than 15, ranging from 25 to 151 units.</p> <p>In assessing the 'proportion', the study considered 'strong & weak' market conditions and 'with & without' grant scenarios. It was found that even in the peak market, full viability of the 6 schemes required the availability of grant. Without grant, only 3 were viable and another was marginally so. Of these 3, two were sites with possibly unusually low established use value (allotments and private sports pitches).</p> <p>Even though Norwich is said to have been more than averagely successful in attracting grant it is unclear how far this relative success has extended to the JCS or Norwich Policy Areas as a whole or what grant availability will be in future.</p> <p>In response to the Inspectors' query about viability testing of AH across the JCS area (Q13), GNDP has stated that affordable housing viability testing has been undertaken in the context of the general high-level testing of AH and tariffs at part 16 of the EDAW/Drivers Jonas Infrastructure Study (document INF1), but it is unclear that this evidence is sufficiently focussed to satisfy the Blythe Valley test.</p> <p>According to INF1, housing grant is likely to be necessary to meet funding gaps in the Growth Triangle (in unstated market conditions); in the Norwich and mid-South Norfolk HMAs of South Norfolk (even in strong market conditions) and in the 'Rest of South Norfolk HMA (in weak market conditions).</p> <p>INF1 p217 states "...the issue of grant support is critical to securing tariff based on an affordable housing target of 40%".</p> <p>Summary The above suggests that there is no specific evidence about the viability of a reduced threshold, or (in Broadland and South Norfolk) about the 40% proportion, although it is clear that heavy reliance would have to be placed on grant availability. Even within Norwich it is not entirely clear that 40% AH was viable even in the unsustainable state of market boom prevailing in 2007,</p>	<p>The Partnership is not in a position to respond to the assessors report given the late receipt of the report. But has the following questions:</p> <p>Do you endorse the view of the Assessor? Can you point us to the requirement in PPS3 to support this?</p> <p>The Partnership requires a clear brief in order to undertake further work. What is the requirement? Who will be able to provide this?</p> <p>Scenario one</p> <p>In light of the assessors comments to acknowledge that what the Partnership has does not meet the letter of PPS 3. We feel the passage of time, the level of housing need in Greater Norwich and the change in market conditions makes the approach proposed reasonable for the following reasons:</p> <ul style="list-style-type: none"> • The CIL regulations, or a similar approach adopted through a tariff mechanism is intended to be transparent and predictable This coupled with a scaled back S106 mechanism dealing only with site specific mitigations likely to be essential means that all of the necessary flexibility to take account of shifting markets tends to be focussed on affordable housing and therefore any figure will require flexibility built into the policy and we believe we have done this in recognising the proportion of affordable housing and availability of grant • PPS3 requires a judgement based on an informed assessment on the availability of grant. Within the last two weeks the GNDP has met with the HCA who have confirmed they cannot predict grant levels from 2011 onwards. An assumption of zero funding as advocated by the advisor, while cautious, would be simply an assumption rather than an informed assessment. • A percentage established as viable in current market conditions would not meet the demonstrated need, and would therefore also not be compliant with the wider requirements of PPS3 and would make it impossible to negotiate a higher percentage as market conditions or grant support changes. • The Assessors comments relate very largely to the Norwich specific study rather than the broader study on which the Partnership place more weight. The Partnership believes the Study did look at a range of possibilities including variations in landowner aspiration, market conditions and grant availability and we feel that although this demonstrated difficulties of viability in different combinations of circumstance the Partnership believes a this coupled with a flexible policy is the right approach. • PPS3 was conceived in a rising and stable marker and recent market volatility has demonstrated the impossibility of an assessment remaining valid through all potential market cycles <p>Scenario two</p> <p>If the Inspector wants something that addresses the requirements of PPS3 we could have something relatively quickly but we would have concerns that this would have to be undertaken of the absence of certainty about future CIL or tariff levels. In the absence of guidance the Partnership would request clear guidance from the Inspectors as to the nature of the study that would meet the requirements of</p>

still less now, and particularly without grant.

Since we reached that conclusion a technical advisor, Mr Nigel Jones FRICS, has been appointed to assist us in considering the soundness of the AH policy.

We provided him with a brief setting out particular questions and have very recently received his preliminary reply, the nub of which is as follows:

Q1 Do the relevant parts of the EDAW/Drivers Jonas report (INF1) adopt a reasonable method of assessment? Does this approach provide robust and convincing evidence to underpin policy 4 and satisfy the PPS3/Blythe Valley tests?

As I have stated in my comments above, the Drivers Jonas report and the Infrastructure Needs Funding Study do not provide either robust or convincing evidence to underpin the AH policy. There must be an objective tests of viability against which any site can be considered, all testing must be on the basis of no grant funding and there must be greater geographic testing.

Q2 Is the report sufficiently focused on the viability of AH?

In essence the answer to this is no. I have set out in my general comments above why the viability of AH is a very complex subject but essentially it is under pinned by the issue of whether or not a landowner is incentivised to sell his land.

Q3 Does the report assume unrealistic levels of captured land value?

The captured land value is set out in the Infrastructure Needs Study. For the reasons set out above I do not believe that this is the correct way if dealing with such matters as it inputs a hypothetical figure which may or may not be sufficient to incentivise a landowner.

Q4 Does the evidence place an unrealistic emphasis on the availability of past average levels of grant per AH unit bearing in mind the policy requirement to substantially increase the proportion/quantity of AH units provided?

For the reasons set out above, any viability testing must be on the basis of a no grant scenario.

PPS3, Blyth Valley and the CIL regulations.

Scenario three

Withdraw the plan and resubmit alongside a CIL charging schedule where the 2 can be looked at simultaneously but this would result in a considerable delay in adopting the Strategy and securing a five-year land-supply.

It is considered that affordable housing viability cannot be assessed in isolation from an assessment of other development costs including infrastructure. That is why the work on viability for the Joint Core Strategy was an integral part of the Infrastructure Needs and Funding Study 2009.

The outcome of the Infrastructure Needs and Funding Study 2009 indicates that the targets in the policy will be challenging in many cases especially given the current economic climate, but without more certainty over mainstream fund for infrastructure and Affordable Housing support from the HCA it is impossible to establish the exact position. Therefore the policy accepts that the level of Affordable Housing may vary site by site and through time.

If the Affordable Housing target in the policy was much lower than need, the strategy would fail to deliver sustainable and balanced communities and this could only be rectified through additional public funding support, for example from HCA.

Feedback from GNHP "Perhaps a reference back to the Regional Housing Statement about delivery of 35% affordable housing, and that this isn't achievable without a 40% affordable housing requirement on eligible sites. Each site is considered on a case by case base and we've had one site which has had 40% aff housing funded by the HCA on viability grounds. However a number of other sites have delivered 40% affordable housing."

The Partnership understands that CLG is reviewing the continuing relevance or the PPS3 approach as it has been overtaken somewhat by the CIL regulations. The Partnership has requesting further information on this from GO-East. The regulations offer comfort as a CIL will need to be set at a viable level and be independently tested through formal examination. The GNDP will be commissioning further viability work as part of developing a charging schedule for the CIL.

Feedback from Drivers Jonas, who carried out the viability work that was included in the Growth Infrastructure and Funding Need Study, is "affordable housing policy levels and the CIL charge are linked and both play a part in viability."

The GNDP and the GNHP met with the Homes and Communities Agency on 4 May 2010 for the initial meeting covering the HCA 'Single Conversation'. The HCA were unable to give any certainty on funding for the period post 2011 as they have no idea what their budget may be, coupled with the uncertainty over the HCA long-term future if there is a change in central government. It was agreed that the GNDP will begin to work with the HCA over the next few months to develop a 'Local Investment Plan' that will provide support to ensure delivery of the growth agenda. However, the HCA were clear that without an adopted JCS it is difficult to prepare an investment plan with any degree of certainty.

The NDR		
Inspectors questions / notes		GNDP response
<p>Preliminary soundness concerns arise around the statement in para 5.44 of the JCS that “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...”</p> <p>- Are the costings realistic and can the scheme be delivered in the timescale assumed in the JCS?</p>		<p>The NDR is an element of Norwich Area Transportation Strategy implementation plan which includes walking cycling and public transport. The strategy has been modelled assessing traffic and public transport impacts.</p> <p>Policy 10 of the JCS refers to orbital movements that will specifically link the growth triangle to adjacent employment services, not solely public transport.</p> <p>NDR press statement as previously supplied</p> <p>The NDR was scrutinised in detail by the Department for Transport (DfT) as part of their assessment of the Major Scheme Business Case, which includes detailed cost benefit appraisals. They (DfT) have determined that the project business case is sound and confirmed programme entry for the project (see DfT press releases and letter as discussed at the Exploratory Meeting). The costings have also been developed with the input of an already appointed contractor (Birse Civils Ltd). The timescale is realistic and has been set out in various County Council Cabinet reports, the most recent of which being the 6 April 2010.</p>
i	<p>What would be the <u>role and function</u> of a distributor road from the A47 to the east of the City to the A1067 to the north-west?</p>	<p>The NDR is part of the Norwich Area Transportation Strategy (NATS) and will:</p> <ul style="list-style-type: none"> • Reduce congestion on strategic routes to the north of the city • Reduce noise, air pollution and accidents for communities in the northern suburbs of Norwich and villages outside • Enable removal of through traffic from the city centre and implementation of widespread pedestrian / bus priority measures. • Provide direct access to growth locations, helping to deliver significant housing and employment growth • Support the continued success of the Norwich economy.
ii	<p>What would be the main <u>regional and local movements</u> that it catered for?</p>	<p>The NDR will be connected to the national trunk road network at the A47 at Postwick and improves access to Norwich International Airport as well as key existing and proposed housing and employment sites. As a part of NATS, the NDR provides the potential for modal shift to more sustainable forms of transport.</p> <p>The NDR will improve access from the north of Norwich / Norfolk, including Norwich International Airport, to the national trunk road network. Access to key employment locations, such as those at Broadland Business Park and the Airport, will also be significantly improved. As part of the NATS IP, the NDR is forecast to remove traffic from rural routes unsuitable to through traffic. For instance, in terms of trips to and from Wroxham to the north east of Norwich, nearly 70% of trips are forecast to make use of the NDR.</p> <p>The NDR will also enable cross city movements for people wishing to access the north of Norfolk from the south and vice versa, avoiding the current need to use the key radial routes and inner and outer ring roads.</p>
iii	<p>What would be the <u>main aspects of relief</u> that it afforded</p>	<p>The NDR will</p>
		<p>Supporting Evidence</p> <p>TP9 JCS Transport Topic Paper - Section 4.9</p> <p>T4 JCS Transport Strategy - Section 3.6</p> <p>T11 NNDR Report to Cabinet, September 2005 - Appx 3 sections 3 and 4</p> <p>T12 NNDR Major Scheme Business Case, July 2009 - Strategic Case/ Exec Summary/ Scheme Description</p> <p>T1 Strategic Modelling of JCS - NATS Plus Implementation Plan - Section 4 and appendices</p> <p>T4 JCS Transport Strategy - Section 5 and appendices</p> <p>T12 and T14 - NDR Major Scheme Business Case, July and December 2009</p> <p>T11 NNDR Report to Cabinet, September 2005</p> <p>NDR Traffic and Economic Assessment Report (Feb 2005)</p> <p>T4 JCS Transport Strategy Report, January</p>

	elsewhere?	<ul style="list-style-type: none"> • Remove traffic in the northern suburbs of Norwich along roads that are residential in nature and not suited to high traffic levels. • Provide the conditions for restricting through traffic enabling the introduction of further bus priority, walking and cycling measures <p>The NDR will be effective in reducing traffic flows along radial roads into the city, particularly in the north of the city. The traffic relief will enable bus priority measures, walking and cycling to be implemented to preserve the traffic relief benefits and guard against inducing further car borne trips.</p> <p>JCS Transport Strategy Report, January 2010 – Appendix C. Tables presented showing changes in traffic flows on radial routes</p>	2010 - Appendix C
iv	How, specifically, would the NDR assist in achieving significant improvements to public transport, walking and cycling,	<p>The NDR is part of a NATS Implementation Plan that includes significant enhancements to walking and cycling and public transport improvements ranging from small scale measures up to the provision of full Bus Rapid Transit (BRT) along key radial routes into Norwich. The modelling evidence shows that the NDR will provide traffic relief across the city centre. The reduction in traffics will allow the introduction of significant improvements to public transport, walking and cycling.</p> <p>Similarly, full benefits from road space reallocation will only be realised on some corridors once the NDR is open.</p> <p>By reducing traffic flows, opportunities arise for more pedestrian crossings to be provided and will also enable increased levels of priority to be given to pedestrians at signalised junctions.</p> <p>Reduced traffic flows in the city centre and elsewhere will create the conditions for increased cycle use. It was stated in the public consultation, Oct-Nov 2009 that this is a key factor in encouraging more people to cycle. Reduced traffic flows through busy junctions will enable increased levels of priority to be given to cycle crossings.</p> <p>See below comments in response to – “What are the evidence-based benefits of the NDR to public transport?”</p> <p>Norwich Area Transportation Strategy (NATS) Implementation Package, GNDP Policy Group, 25 March 2010, Appendix B</p> <p>.....”Some BRT corridors are more dependent on the NDR than others in terms of being able to provide the necessary levels of priority for buses”</p> <p>.....”Whilst it is considered that traffic light priority can be delivered along all corridors, some will only benefit from the full potential of bus priority through key junctions once levels of general traffic are reduced following the opening of the NDR.”</p> <p>...Significant works within the city centre “will be dependent on delivery of the NDR and the alternative route options the NDR provides”</p> <p>....The city centre proposals, enabled by the NDR, will “enable increased levels of priority to be given to pedestrians at signalised junctions”</p> <p>...”Reduced traffic flows in the city centre and along some key routes will</p>	EIP2 NATS Implementation Package, GNDP Policy Group, 25 March 2010, Appendix B

		create the conditions for increased cycle use"...and will "enable increased levels of priority to be given to cycle crossings"	
vas opposed to channelling traffic (especially that from the major North East growth area) onto the new highway?	Introduction of public transport, walking and cycling measures will reinforce the function of the NDR to remove through traffic pressures from unsuitable areas of the network like the northern suburbs and the city centre.	As above
vi	What are the evidence-based benefits of the NDR to public transport?	<p>Existing transport corridors in Norwich that have extensive bus priority measures are shown to perform significantly better in terms of bus service punctuality than corridors that lack bus priority. The NDR gives traffic reductions on key routes and provides the conditions for bus priority measures to be provided on more corridors.</p> <p>High journey time variability and congestion have resulted in bus operators increasing journey times and reducing frequency. The NDR will create conditions whereby journey times for buses become less variable, enabling services to be increased in frequency with reduced journey times.</p> <p>Public transport services use the same roads and junctions as general traffic. Therefore, the performance of the highway network influences the performance of the public transport network.</p> <p>Section 4.7, JCS Transport Strategy Report, January 2010</p> <p>"...the NNDR has a significant effect on forecast average speeds, which are a measure of network operation and congestion.....the NNDR negates decreases in average speeds resulting from additional numbers of vehicle trips in 2016, and provides significant mitigation in 2031."</p> <p>Section 4.8, JCS Transport Strategy Report, January 2010</p> <p>"...the proposed NNDR in the Do Something Scenario provides reductions [in traffic flow along radial routes] over the Do Minimum".</p> <p>Section 5.1, JCS Transport Strategy Report, January 2010</p> <p>"...The resulting lower traffic flows would enable public transport improvements to take place with less adverse effects on general traffic conditions than would otherwise occur. Without these lower traffic flows, introduction of public transport improvements would not be as effective or attractive in terms of encouraging mode shift to more sustainable alternatives."</p> <p>Section 4.9, JCS Transport Strategy Report, January 2010</p> <p>The inclusion of the NNDR in the 2031 Do Something Scenario reduces the number of junctions with V/C values of 90% to 100% from 20 to 14 (a reduction of 30%). The majority of these junctions are in the northern sector and the eastern section of the A47.</p> <p>Section 5.2, JCS Transport Strategy Report, January 2010</p> <p>"....The improved operation of junctions would enable public transport improvements to take place with less adverse effects on general traffic conditions than would otherwise occur."</p>	<p>T4 JCS Transport Strategy Report, January 2010</p> <p>T5 Baseline Conditions Report, Joint Core Strategy Submission</p>

		<p>Baseline Conditions Report, Joint Core Strategy Submission, Chapters 4-5, Section 5.1.1.15</p> <p>“The majority of roads affected by high [bus] journey time variability are radial routes from the north” (Figure 5.24)</p> <p>Baseline Conditions Report, Joint Core Strategy Submission, Chapters 4-5, Section 5.1.1.17</p> <p>“The worst performing [bus] corridors are those accessing the city from the north”</p>	
vii	How would it relate to increased bus penetration into existing and proposed housing areas and the existing P&R schemes?	<p>New and existing bus services are flexible in their routing and new developments will be designed around public transport rather than the other way round. Existing services to and from Park & Ride sites will benefit from new bus priority measures and improved access to the city centre. There is the potential to relocate the Airport Park & Ride site to a location closer to the NDR, which would make this a more attractive travel option.</p> <p>The NDR will provide opportunities to direct people to existing P&R facilities at Postwick and the Airport</p> <p>The majority of bus services in Norwich are operated on a commercial basis by operators, and decisions on routing and timetabling are taken on this basis. In terms of new development areas, operators and transport officers are consulted and routes are often put out to competitive tender if funding for a new service becomes available through development. It is a key requirement to ensure all dwellings / places of work are within 400m of the nearest bus stop and that appropriate levels of service are provided.</p>	
viii	How advanced/realistic are the County Council's plans for an orbital bus route?.....	<p>Policy 10 refers to ‘orbital bus services’ in the context of the growth location to the north east of Norwich. Orbital bus connections will provide linkage between new housing and existing employment opportunities at Broadland Business Park, Rackheath and the airport.</p> <p>Norwich Area Transportation Strategy (NATS) Implementation Package, GNDP Policy Group, 25 March 2010, Appendix B</p> <p>...”New bus services linking key residential and strategic employment growth areas will be considered in partnership with developers and transport providers. Delivery of these will, in most cases, be dependent on the delivery of growth”</p> <p>NOTE (but not part of JCS evidence): NCC operated an orbital bus service during 2005-6, which proved to be unsuccessful. Reasons attributed to this were the route being too long (1.5-2 hours) and unreliable as well as a lack of promotion. There are currently no commercially operated orbital services in Norwich. Bus operators are reluctant to operate new orbital services commercially unless there is third party funding to pump-prime a service and there is strong evidence that there will be growth and demand for a service. Based on lessons learnt, it is unlikely that fully orbital (ie. full loop) services will develop and services will therefore be linking services that do not complete a full-loop of the city.</p>	NATS Implementation Package, GNDP Policy Group, 25 March 2010

ixand is it dependent on the NDR?	<p>The provision of new services will not be dependent on the NDR, [however see NOTE comment in box above]. NCC will work with developers and bus operators to identify the feasibility for introducing a bus service providing orbital linking movements.</p>	
	<p>General observation</p>	<p>As Section 3.9 of the JCS Transport Strategy explained, considerable work is ongoing in relation to the development of the NDR and the detailed implementation of NATS. In April this year the NATS Implementation Plan was approved by the County Council cabinet and we would be pleased to update the Inspectors on the Implementation Plan and continuing progress in this respect.</p>	

The distribution of development in relation to public transport opportunities	
Inspectors questions / notes	GNDP response
<p>Preliminary soundness concerns arise around whether the JCS will provide the most appropriate strategy for fulfilling the particular objective of EoE Plan policy NR1 that this major regional growth point should “achieve a major shift in emphasis across the NPA towards travel by public transport, cycling and walking”.</p> <p>The question therefore arises: <u>What is the evidence that the distribution of growth in the JCS will successfully achieve this fundamental objective?</u></p> <p><u>Does it contribute towards measurable, sufficient and achievable modal shift targets?</u></p> <p>Three questions relating to the deliverability of public transport, and in particular a significantly increased modal share through the implementation of BRT require evidence based answers. Firstly, how is the estimated £65 million (T3, pages 2-22 and 2-23) to be financed? Secondly, is the pattern of major housing and economic development sufficiently aligned to maximise public transport use? Thirdly, given the need to introduce high quality public transport at the outset of the implementation of major housing schemes (T3A, page 2), how realistic is this scenario?</p>	<p>The Sustainability Appraisal shows that all locations, including Long Stratton, are very good in principle for providing cycling and walking opportunities to work and services. All locations are on proposed corridors that are identified for public transport enhancement.</p> <p>How the opportunities to enhance public transport, walking and cycling are developed depends on how the NATS is implemented – the NATS Implementation Plan is still in development – the role of NATS will be to maximise public transport, walking and cycling opportunities in growth locations.</p>
<p>The summary findings of the Sustainability Appraisal record that the strategy for major expansion of a number of existing communities in South Norfolk places “increased difficulty of achieving a degree of self-containment and providing attractive public transport options that encourage people to use their cars less”. The SA summary finds that growth in the A11 corridor is focussed on areas “where there should be the potential to connect to Norwich via a bus rapid transit service, although it is difficult to be completely certain about deliverability/financial viability at this stage”. Perhaps tellingly, para 2.2.57 states that none of the growth areas under the South Norfolk distribution are of sufficient size to support a turn-up-and-go bus service in 2021. However, the proposal for 4,400 dwellings on the A11 corridor at Wymondham, Hethersett and Cringleford is said at [2.2.59] to be “at the borderline” of providing a potential market sufficient in size to support the development of “Bus Rapid Transit service”. [More explanation required of what this means]</p> <p>The growth proposed for Long Stratton poses particular soundness concerns. As long ago as 2007 the SA of the Issues and Options report (which identified a wide range of potential geographical locations for growth) concluded (p100) that LS “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 accompanying the Issues and Options consultation arrived at comparative scores for all the potential growth locations and accorded LS a very low score – exceeding only one other location - the South East.</p>	<p>The strategy aims to have growth locations served by high quality public transport and the locations have the potential for this. The public transport assessment of the growth option shows that when taken in combination the growth locations are of a scale to support turn up and go services. Measures can be introduced on corridors to enhance public transport services and build towards bus rapid transit.</p> <p>Current timetables show Long Stratton is served by a dedicated half – hourly service Monday – Saturdays 7am – 7pm. It is also served by through services. Long Stratton proposals include enhancement to bus journey time reliability on the route into Norwich.</p> <p>Paragraph 6.13, page 66 of the JCS notes 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. To ameliorate the impact of more limited opportunities for non-car trips to specific locations and other facilities in Norwich, it will be particularly important to take a ‘whole-settlement’ approach to the development of Long Stratton to maximise the number of trips on foot, or by cycle’.</p> <p>The County Council has a proven track record of promoting public transport and this is evidenced in the letter from GO-East in relation to the first Local Transport Plan - extract below:</p> <p>“Delivery of the First Local Transport Plan.....</p> <p>.....Overall this delivery report shows that LTP1 has delivered a step change in travel choices especially in terms of reducing traffic in Norwich and improving public transport provision.</p>

<p>Even more particularly, the SA identifies Long Stratton as standing out “as being less suited to encouraging more sustainable patterns of travel...(as it is)... geographically isolated from Norwich and major employment locations in comparison with the other major growth locations and.....there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars. [Long Stratton is identified in document TP9 as having only a ‘relatively successful’ half-hourly bus service.] The SA finds that growth here is “undoubtedly a significant negative effect of the strategy and probably the major issue that has been highlighted through this SA.”</p> <p>Despite this the SA states that the scale of the growth at Long Stratton (as a proportion of the total) is not such as to “place in question the overall sustainability of the JCS in terms of achieving sustainable patterns of travel...”. After discussing the proposed growth as the only means of securing a bypass and its associated benefits, the SA finds it “more difficult to say whether the ‘local level’ benefits associated with growth at Long Stratton outweigh the more ‘strategic’ disbenefits. It concludes that, irrespective of the answer to that question, there must be focused efforts to mitigate negative effects and recommends that “there is justification for going further, perhaps by developing a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton”.</p> <p>Summary <u>Is there evidence to conclude that the required culture change from car-borne transport to more sustainable modes, will be supported by the selected pattern of development? Could changes be made to the JCS to make it justified and effective in this respect?</u></p>	<p>Key aims have been achieved and the strategy has been delivered in close partnership with stakeholders and the public. You have learnt lessons over time and implemented changes to internal working to ensure delivery remains effective and of a sufficiently high quality. The Norwich park and ride network has been extended and now has the most parking spaces in the country and 11.4 million passengers have used the park and ride facilities.”</p>
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Selected sustainability issues	
Inspectors questions / notes	GNDP response
<p>Preliminary soundness concerns arise around green infrastructure, energy efficiency and water resources.</p> <p><u>Green infrastructure</u> The JCS defines green infrastructure, contains two helpful diagrams at p35 (strategic green infrastructure) and p69 (green infrastructure priority areas) and gives an indication of costs in Appendix 7. <u>However, there are concerns over how well the concept is integrated into the JCS. Does policy 1 provide a sufficiently sharply focused strategic brief on the purpose and deliverability of green infrastructure? Should it require certain future DPDs to define the geographic boundaries of strategic green corridors, and include detailed policies for the management of green infrastructure? Or are the key principles going to be covered in related DPDs, such as those addressing recreational provision or bio-diversity? (These topics do not appear to be addressed specifically in any of the South Norfolk DPDs.)</u></p> <p>The Infrastructure Needs and Funding Study (INF1) refers to the Green Infrastructure Strategy of 2007 (ENV6), but the role and purpose of this strategy is not specified or identified in the JCS. The Green Infrastructure Strategy itself states (p6) that “The planning system provides an important framework within which different components of green infrastructure can be safeguarded and enhanced. The LPAs in the Greater Norwich Area will need to set a clear and robust planning framework for the creation, management and maintenance of greenspaces (including) general policies for greenspaces as well as policies and proposals for specific greenspaces.”</p> <p>[It is also noteworthy that the key to the diagram on p35 appears incomplete: some shadings (light red, light green and pastel green) are unexplained, as are the blue corridors. Also, the words after ‘NB’ are incomplete.]</p> <p><u>Energy efficiency (policy 3)</u> The overall message in the PPS1 Supplement regarding energy efficiency (paras 11 and 31-32) appears to be either to keep to national targets or to demonstrate clearly the local circumstances which warrant the adoption of more ambitious targets on certain sites. In particular, there is concern whether such circumstances have been justified in relation to the requirement of policy 3 that level 4 of the Code for Sustainable Homes be reached by adoption of the JCS and code 6 by 2015. <u>What are the clear local circumstances outside the Rackheath eco-community which would justify a more ambitious across-the-board policy demand than that contained in national policy (which is itself considered by some to be ambitious and seeks through the road-map for Building Regulations to reach zero carbon standards for homes by 2016 and for other buildings by 2019)?</u></p> <p>Should Policy 2 provide a more selective and less blanket approach to sustainable energy and carbon reduction?</p> <p><u>Water (policy 3)</u> Concern has been expressed by a number of official and other bodies that the proposed level of development would result in over-abstraction of rivers and the Broads, and that without commitment to a satisfactory level of waste water treatment early in the plan period, significant environmental damage could be caused to many of the watercourses. In the light of the constraints identified by the WCS in relation to completion of interceptor sewers by 2019, is the NE extension capable of delivery within the proposed timescale and has any work been carried out in relation to the limited capacity of Long Stratton (1400) identified in the WCS? Have the likely sources of timely revenue been identified?</p>	<p>ENV6 – the Green Infrastructure Study – a draft strategy - forms part of the evidence base for the JCS. ENV 2 - The Green Infrastructure Delivery plan moves the study forward. Site specific DPDs will integrate green infrastructure and will have to be consistent with the JCS.</p> <p>[Noted – this is a printing error – map provided]</p> <p>The Policy is based on evidence from the Sustainable Energy Study for the Joint Core Strategy. Following advice from the evidence study, it provides a selective approach for energy production for new development dependent on the scale of development as larger scale on site energy production is more cost effective. It does not differentiate between Code for Sustainable Homes requirements as the higher the standards of energy efficiency in new housing, the lower the amount of energy required to serve the development.</p> <p>Over-abstraction is not an issue – the review of consents will give Anglian Water the opportunity to resolve the issues (this is endorsed by the Position Statements).</p> <p>The Partnership is actively engaged with Anglian Water and a series of meetings are underway, the first meeting to consider delivery was held on 6 May 2010.. Discussions are also ongoing with the Landowner at Long Stratton.</p>

Strategic allocation of the North-East growth area	
Inspectors questions / notes	GNDP response
<p>Preliminary soundness concerns arise around whether the JCS provides sound and sufficient information about the what/where/when/how questions concerning the planning and effective delivery of the growth triangle, given that some significant points in the GNDP reply to the Inspectors' queries Q19 are not clearly specified or referenced in the JCS itself.</p> <p>These include:</p> <ul style="list-style-type: none"> - the means by which 'a single co-ordinated approach' will be secured to the planning of the 'whole area', particularly the provision of timely, appropriately-located, equitably-financed infrastructure; - the logic for commencing a major urban extension of 10,000 homes with a development on a detached site which then becomes progressively stitched in to the urban fabric as later development takes place on the intervening land; - any necessary high-level strategic design steer on the number, approximate location and nature of the individual 'quarters', the 'high street', the new local centres, the secondary school, the major green spaces, the employment areas, more certain bus rapid transit corridors, and the strategic approach to cross-NDR permeability; - the possible necessity for some form of key diagram (like that for the city centre at p73) to provide a firm strategic context for the planned SPD in terms of the above points. <p><u>Are any changes needed to the JCS to enable it to gain full effectiveness in providing a strategic brief which is sufficiently clear to enable the development of the area to be taken forward successfully through a future SPD?</u></p> <p><u>A further question arises around whether or not the "minor" post-submission change re-labelling the growth triangle a "strategic allocation" (intended to be followed up via SPD, rather than constituting a "location" to be followed up via an AAP) is appropriate for treatment as a "minor change". Has the seemingly diagrammatic boundary in Appendix 3 provided sufficient clarity for landowners and others wishing to challenge the inclusion/exclusion of certain areas from the proposed allocation? Is there a possibility that people who may have expected to be able to challenge the exact boundaries when defined through an AAP could lose their statutory right to do so through the SPD route?</u></p>	<p>In practicality Rackheath comes forward quickly because of funding not through any deliberate phasing – the rest of the Growth Triangle will come forward as quickly as it is able to.</p> <p>Would it help if we mapped the constraints? Consultants are being engaged to develop a Masterplan which will be consulted on.</p>

8 June 2010

Mr R Middleton
Planning Inspectorate
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2 The Square
Temple Quay
Bristol BS1 6PN

Dear Rob

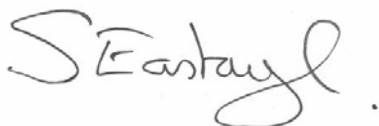
JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK

I am writing to you, on behalf of the Partnership, to seek clarification on how the Inspectorate intends to proceed with the Examination in Public.

As you know, the Greater Norwich Development Partnership has prepared a Joint Core Strategy for Broadland, Norwich and South Norfolk. The Strategy was submitted to the Planning Inspectorate on 5 March 2010 and an Exploratory Meeting was held on 13 May 2010. The Partnership is now preparing for Examination in Public at the end of October.

Following publication of *Coalition: Our Programme for Government* and the letter from the Secretary of State regarding the abolition of Regional Strategies the Partnership is facing a number of uncertainties. Is there an intention to issue formal guidance to Inspectors? If so it would be helpful to have sight of this to allow us have confidence that we are well prepared for the examination and that the Strategy can move forward to adoption.

Yours sincerely,



Sandra Eastaugh
Greater Norwich Development Partnership Manager

Enclosure: Letter to Inspector Roy Foster, 8 June 2010