

# Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership

## MATTERS & KEY QUESTIONS FOR EXAMINATION AT THE HEARINGS

### Response from CPRE Norfolk

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**MATTER 3. Strategy and locations for major growth in the NPA (policies 9 and 10, and Appendix 5), including consideration of related access & transportation issues (policy 6) and other infrastructure issues.**

#### **Part A. Overall distribution of growth**

1. **A1** The absolute and comparative quantities of growth distributed to the main locations are not the most appropriate, and are not founded on a robust and credible evidence base. Overall housing provision greatly exceeds past historic highs, and is assumed to continue in this mode over the plan life. It is by no means clear that the expectations and plans for new jobs delivery can be achieved.
2. The spatial strategy has never set out a convincing case why housing and job growth should be so concentrated in the north east sector, whilst there is more of a dispersal approach in the south west sector.
3. The basis of the plan goes back to 2005, and it was conceived through RSS to the setting up of the GNDP approach in a very different economic situation and expectations. There has been no concession and re-think on the plan in the changed circumstances, only to re-iterate it depends on the perceived infrastructure requirements being fully met.
4. **A2** Neither the level or pattern of development is deliverable in infrastructure and market terms. The very long list of infrastructure needs is not costed except for road schemes (approaching £300 million); there are no differentials between 'critical' in terms of need and the pathway to the delivery (except for

road schemes); necessary; desirable; would be nice to have. There appears to have been no serious re-evaluation of the JCS in terms of the changed economic circumstances, and a difficult and uncertain housing (and jobs) market.

5. **A3** There is no clear indication in the JCS how proposals may be advanced, delayed or modified; although they are subject to monitoring and review. The general impression is inclined more to it will happen, or will not happen, depending on the delivery of the infrastructure, which covers a wide range of needs covering a number of different bodies and funding sources. This is particularly emphatic for the north east sector, but is also true for the South Norfolk growth centres.
6. **A4** The statement 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'*. The 'key dependencies' most emphasised are roads orientated. They are the Postwick Hub and NDR in the north east; and the road junctions on the A47 southern bypass, and a bypass for Long Stratton. Public transport in both cost and delivery timescales takes very much second place. There are other 'key dependencies' which should be better focussed. Some of these should be satisfied before land is released for major growth. We would place in this category affordable housing, water resource and waste water treatment works, and in the 'soft' category, primary and secondary education.
7. **A5** The allocation of 1800 dwellings to smaller sites in the South Norfolk NPA, 'and possible additions to named growth locations', is a fudge factor. This may be because it will be difficult to place 1800 dwellings in small sites, especially now with the removal of garden sites from PDL. It also avoids placing a higher allocation than now stated in Wymondham (2,200), Long Stratton (1,800), Cringleford (1,200), Hethersett (1,000) and Easton/Costessey (1,000).
8. **A6** The suggested change would better reflect the function and purpose of the Community Infrastructure Levy Regulations 2010, which is to service what the development which it generates, rather than repair existing deficiencies, which is the thrust of the JCS sentence. It may that in doing performing this function there are some second order benefits to existing residents.

**Part B. Old Catton/Sprowston/Rackheath/Thorpe St Andrew growth triangle (part policy 10 and appendix 5**

## Procedure

9. **B1** The GNDP Focussed Changes 8-10 for policy 10 and appendix 5 do NOT provide a sound procedural basis for the strategic allocation of the growth, nor an appropriate level of guidance for taking development forward in a coordinated way without an APP through future detailed master planning of the various 'quarters'.
10. The substitution of the word 'location' by 'strategic allocation' in FC8 means in practice that instead of a public consultation on the growth triangle (which would happen with an Area Action Plan) there will be no public consultation (which can happen with a Supplementary Planning Document). This could be challenged in the Courts as to legality. It is certainly neither justified nor effective; and it continues the lack of transparency throughout the process to date.
11. The reasoning for the course of action is set out in the minutes of the Broadland Cabinet meeting of the 22<sup>nd</sup> December 2009: *An alternative to the production of an AAP was the production of an SPD which would give Broadland the opportunity to ensure that its objectives for the growth triangle were achieved and improved the rate at which the planning framework could be developed. This strategy has been pursued by other planning authorities in England. Whilst it was noted that there were two key risks associated with the development of an SPD as opposed to an AAP, the benefits were considered to outweigh the disadvantages.*
12. There is no record of what were the two key risks; perhaps one a legal challenge, perhaps the other that the approach might be considered to be unsound at the public examination stage.
13. The amended FC8 deletes *'This location will deliver an urban extension extending on both sides of the Northern Distributor Road.* The replacement text says: *This strategic allocation will deliver an urban extension extending on both sides of the Northern Distributor Road, within the area shown in appendix 5.*
14. Whether the growth triangle is a 'location' or a 'strategic allocation' it is in the view of the GNDP dependent on the provision of an NDR. However the Secretaries of State (CLG and DfT) decision letter of the 2nd August casts some doubt on the provision of the NDR in relation to the draft orders on the slip and side roads. The Secretaries of State say (point 4) that they *are satisfied*

*that in the circumstances of the case the remaining objections raise issues of such significant public importance that they should be debated publicly at a local inquiry and an inquiry is likely to produce significant new information relevant to their decision.*

15. Further they say at point 5 that *It has therefore been decided that until the Government's spending review has been concluded, the Department for Transport will not be in a position to identify those major projects which it can support, consistent with the Government's objectives. In view of the uncertainty over the availability of the funding for the scheme, it has been decided to defer, for the time being, the holding of the local inquiry.*
16. The Northern Distributor Road is set by the JCS as a fundamental requirement for the scale and location/allocation of development in the north east sector, and indeed for the overall spatial strategy for the Norwich Policy Area. There is no 'plan B'. We consider therefore that the whole Core Strategy is unsound, and the Government decision on the inquiry supports the case for the withdrawal and review of the JCS; if the result of the spending review is that the NDR is either put 'on hold' or abandoned there can be no other option.

### **Soundness of the proposal**

17. **B2** FC 9 and FC 10 introduce a Concept Statement for the growth area, and replace appendix 5 in the JCS with a 14 page Concept Statement. The reason for the FC10 Concept Statement is *'to provide more detailed guidance to support the strategic allocation of the Old Catton, Rackheath, Sprowston, Thorpe St Andrew growth triangle'*.
18. There is chasm between the Concept Statement and the proposed 'detailed master planning' for the 'quarters', with no indication of the pathway and interaction of measures in moving from concept to implementation. As such the strategic allocation approach is not justified, and not effective. The absence of public consultation both further weakens the development of sound detailed plans and their implementation, and the lack of transparency inherent in the process is against national policy (most recently the 6<sup>th</sup> July statement on the revocation of the regional strategy).
19. **B3** The rationale provided in the Concept Statement for the strategic allocation has a number of flaws, including:

- the argument that more housing necessarily equals more affordable housing in order to meet housing need, an argument frequently employed while in practice the gap between provision and need has widened over many years (point 3)
- applying the PPS3 five year land supply guidance in relation to a JCS which seeks to achieve a housing trajectory which is not achievable in economic (and environmental) terms for both the housing provision and the required infrastructure to support it; and in light of a circular relationship between the proposed housing numbers, the projected rate of build, and the five year supply requirement (and beyond). An unrealistically high allocation of land leads to disjointed and unbalanced development through 'cherry-picking' of sites (point 3)
- the feasibility of respecting the character and landscape of an area with a plan that envisages such a fast and high level of growth (points 4 and 5)
- the Appropriate Assessment of the JCS under the Habitats Regulations is not sufficient in that there is also the need now to account for the Water Framework Directive and consider potential impacts on the wider water environment. Treatment of waste water, and water resource, is the key issue. We note that the need for mitigation against increased visitor pressure on sensitive Broadland habitats can arise both through this effect as well as the physical disturbance impact that is mentioned (point 7)
- movement along the NDR: the role and dependence on the provision of the NDR are unsound. Public transport based alternatives have not been properly assessed. There is also an overly optimistic view that the NDR will be provided. *A Northern Distributor Road has been proposed for Norwich for some time. It has been awarded programme entry status by the DfT. Funding for the construction of the Postwick Hub has been made available by the Government. As a longstanding element of the Norwich Area Transportation Strategy it is part of the "baseline" for the development strategy* (point 10)
- a Vision which is overly rosy and unrealistic in many aspects in stating that: *The Growth Triangle will have developed into a special, distinct and exciting place through the delivery of 7,000 new homes by 2026 and continuing to grow to around about 10,000 new homes thereafter. Alongside housing, employment opportunities, services, facilities and key infrastructure will have been delivered across three or four*

*main development centres. Development within the Growth Triangle will grow out of and reflect existing places and communities (page 13).*

20. The first map in the FC10 shows the extent (boundary) of the growth triangle. The second map gives an illustration of areas of green space, all of which are existing landscapes/habitats, but in the central area to be bisected by the NDR. The third map shows key transport routes, which includes the NDR and two proposed lengths of link road which run parallel but nearer the existing urban fringe. The existing rail line is shown and a proposed BRT which would run to Rackheath. The fourth map shows constraints and opportunities for new development, in which the proposed eco-community features largely in the 'break-out' area on the north side of the proposed NDR. The main constraint is the airport noise and safety zone in the north west part of the area. The linkage between the Concept Statement and the maps is diffuse.

#### **Transport issues related to the growth triangle**

21. **B4** The NDR is not justified and effective as the 'means of providing the necessary access to key strategic employment and growth locations'. The NDR would reinforce car dependency and create new orbital movements in conjunction with the A47 southern bypass; for example car travel between housing growth in the north east of Norwich and the strategic employment allocations located to the southwest of the city. Rather than reduce congestion, the NDR Business Case shows that there would be some increase in traffic across Norwich, and there would be a substantial traffic increase on the radial roads in the north east.
22. **B5** Rather than make room for significant improvement to public transport in Norwich, and particularly North Norwich, it would squeeze it out. There is first of all the impact of 'less space' on the highways. Secondly that the indicative timescales to implementation in the Transport for Norwich consultation (November 09) showed the Postwick Hub would come in 2010, the NDR 2012-15, and public transport measures subsequent to that; BRT routes would be introduced between 2012 and 2020 (only the A47 Dereham Road scheme earlier). This sequence would exacerbate car dependency. An NDR would produce an additional 25,000 tonnes of CO2 emissions a year.
23. A more effective transport package would involve the phased implementation of bus Rapid Transport for linking up centres of major

housing growth, the city centre, and the strategic employment locations traffic management, improved walking and cycling facilities, modest new road infrastructure, and additional park-and-ride facilities. The network of 6 park-and-ride sites around Norwich has played a major role in reducing the amount of traffic crossing over the inner ring road and into the city by 20% in the past ten years.

24. The eco-town is planned to have a high degree of self-containment. The fact that it is outside the current public transport infrastructure would militate against usage, and it would be appropriate to seek to step-wise increase public transport provision with growth of the proposed town. The biggest deterrent to usage would be the presence of a dual carriageway road across the town and the promotion of the use of the car this would have. The rail halt might be used more from commuters from north Norfolk going to work in the eco-town (which might pull jobs that would otherwise be located in North Walsham or Cromer) than those travelling into Norwich to work. Whatever the intended modal shift to public transport in present plans, the outcome (as indicated by an analysis of the MSBC data) is that the shift is in the wrong direction.

### **Implementation issues associated with the triangle**

25. **B7** NDR is referred to many times in the JCS and other documents as being fundamental to the delivery of the JCS. Over a period of time it has gone from a full west-east bypass to a three quarter route to a half route from Airport to the eastern end. It is by no means clear if this will be approved, delayed or rejected. CPRE are clearly of the view that it should be the latter. The GNDDP have embraced just one outcome, that there would be an approval. There are no other alternative plans or contingencies should it be delayed or rejected on grounds of cost and/or a lack of effectiveness. There is no flexibility in the JCS as regards the delivery of the growth triangle; it is presented as all or nothing.
26. **B8** It is not sensible or practical to make housing starts based on the requirements of a long term strategy that is entirely dependent on the delivery of the Postwick Hub as currently designed and a binding commitment on the NDR. Within the quoted 2,200 dwellings, only those which can be independent of the infrastructure premise should be eligible for planning permission.

27. There should be no development of a 1,000 houses at Rackheath as a start on a strategy which may not be sound and deliverable. In fact, it may be that no developer would be prepared to embark on such a course given the investment implications for an exemplar low carbon development (and water conservation measures). This would be exacerbated by the proposition (paragraph 48) that the development at Rackheath should progress concurrently in all 'quarters'.
28. The £25m cost of the Postwick Hub is predicated on being part of the NDR (although separately funded). For other strategies (eg public transport led) involving the deletion of the NDR, the Hub is heavily over-engineered, a point accepted by the DfT. While some relatively modest improvements are required at this junction, these would be much simpler and less costly to design and build.
29. **B9** Infrastructure for water resource, and in particular for waste water treatment plant, is not specific to the precise location of development in the north east. However the level and rate of build and the need for increased capacity of the infrastructure has major implications for the investment process. It maybe that a modest amount of build can be accommodated within existing capacity, but any small increase beyond this would trigger a requirement for major expenditure, which would have to be justified, and take time to be planned into future programmes. Similar considerations might apply to the provision of education facilities.

### **Other issues**

30. **B10** The JCS submission document is deeply flawed in relation to the growth triangle (and elsewhere). It needs a comprehensive review which engages with the public in an open-minded and transparent process. In our view this would encompass consideration on major reductions in planned housing growth; a review of the economy and job prospects, and the relationship of new jobs to housing provision; a more incremental and organic expansion for the north east which is 'tighter' to the current urban fringe, and in particular the removal of the very large 'spike' area around Rackheath; a transport strategy which is public transport led and embraces the whole of Greater Norwich; and no NDR, but modest road schemes which would integrate with the public transport alternative. Within this there could still be an eco-village, as an exemplar to promote the progressive raising of standards in energy and water savings in the existing housing stock.



## Part C. Other major growth locations in policy 10

### Wymondham

31. **A** The justification for the growth proposals at Wymondham, and the other growth locations to the south west of Norwich, is through a mix of reasons, some of which are constraints. The Yare valley dictates against the extension of the urban fringe, and the town is free standing. At paragraph 6.13 the JCS states: *Growth locations have been selected because they provide the opportunity for easy access to strategic employment opportunities and high quality public transport routes, do not compromise high quality habitats or mineral resources and are not at risk by fluvial flooding*. *A range of locations are proposed to provide a reasonable level of choice for people and the development industry*.
32. CPRE consider that there needs to be a justification for the level of housing provision (not just what the RSS says) at Wymondham and the other growth locations as well as for the location of sites. This involves also an appraisal of the employment prospects and estimates of new job growth at the various strategic employment sites in the vicinity. The 'choice' factor needs to take account of potential spread of new infrastructure requirements.
33. **B** To avoid undue repetition we refer first to the common infrastructure requirements for growth at Wymondham and other South Norfolk growth locations together, and then deal with any specifics to a location separately.
34. Paragraph 6.17 to 6.23 sets out 'key dependencies' and 6.17 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*. Para 6.18 starts the list with: *To implement the JCS significant highway improvements are required at the Longwater (A1074), Thickthorn (A11) and Harford (A140) junctions on the A47 Norwich Southern Bypass*. The list extends to a range of public transport measures (including BRT) cycling and walking networks.
35. There is a need for secondary schools for provision of growth at Wymondham, Costessey and Hethersett where all are on constrained sites; the preferred approach may require the relocation of all three schools to facilitate the expansion. It goes on to say 'utilities such as water and electricity are critical and development can not take place without them'; 'key requirements include environmental improvements sewage treatment

works'; 'a wide range of services and infrastructure is needed to create a balanced community'; 'these are not all listed above'.

36. The conclusion is that 'it will be alright on the night'; this is a paraphrase of *'Timing for delivery will be a matter for the masterplanning process and ongoing management by the GNP'*.
37. Specific to Wymondham, Policy 10 states that the expansion of the town will include:
- expansion of the town centre of a quality that will retain and enhance the distinctive character of the existing historic centre
  - extensive levels of green infrastructure to create a 'Ketts Country' pastoral landscape
  - new pre-school provision and new primary school
  - expanded household waste recycling facility.
38. The implementation of the planned new growth is shown at page 111 as being 185 housing units per year, starting, as for all growth locations (except Rackheath which is earlier), in 2014/15 and running through to 2025/26.
39. There can be little confidence that this level of growth can be sustained for Wymondham with the 'key dependency' infrastructure requirements that are set out; and more so when taken into the context of the similar basic list in other locations. Further the masterplanning delivery mechanism lacks substance.
40. **C** The soundness of the individual proposals for growth in South Norfolk need to be looked at in their totality. The overall level and rate of growth can not be justified, and there should be a reduction in housing provision. Whether this takes place as an overall 'proportionate' reduction, or varying and selective reductions on the locations, or some other re-balancing of the total provision for the NPA in South Norfolk requires more detailed considerations and consultation. Taking into account both job growth and infrastructure considerations, if the 2,200 number was to be retained in Wymondham, then reductions would be required elsewhere.

### **Hethersett**

41. **D** The 'specific' policy 10 requirements for Hethersett are a long distance cycle access to the City Centre, Hethel, Wymondham, Norwich Research

Centre and the hospital; and green infrastructure access to the countryside. The policy states that 'at least' 1,000 dwellings '*will deliver modest growth to the existing village*'.

42. Hethersett is defined as a Key Service Centre (policy 14) which are in the main planned to expand within a range of 50-200 dwellings. The exceptions are Hethersett and Long Stratton with 'at least' 1,000 and 1,800 respectively; plus they are marked\* to show they may help to deliver 'the smaller sites in the NPA' allowance. We would argue that the level of provision of housing for Hethersett is clearly excessive in relation to its role as a Key Service Village in the hierarchy of centres.
43. E The level of growth for Hethersett can not be justified, and should be reduced in line with the range to be found in other 'same order' settlements. The infrastructure claims are in part 'competitive' with those made for other locations.
44. F The housing provision should be decreased in line with the status in the settlement hierarchy.

### **Cringleford**

45. G The case is not made but the village is close to major centres of employment at the hospital and Science Park
46. H There are some common infrastructure requirements to Hethersett. The levels and trajectory of housing provision from 2015/16 to 2025/26 looks to be feasible

### **Public transport in the A11 corridor**

47. K There is a long history of commuting along the A11 corridor from Attleborough to Norwich, in spite of relatively good provision of public transport, bus and rail. The success of a scheme such as BRT is in part determined by a choice which is less weighted in favour of the car than it is now, and increasingly in favour of the use (and hence financial viability) of public transport options. This is part of the package of enhancing transport provision while educing travel need and impact.

### **Long Stratton**

48. **L** There are no justified proposals for the proposed scale of growth at Long Stratton in spatial strategy terms. The Sustainability Appraisal makes a number of valid points. The proposed provision of 1800 houses is an untenable pragmatic approach to funding a bypass.
49. **M** We comment as above at D (Hethersett). The planned provision is incompatible with the role in the settlement hierarchy.
50. **N** The growth proposal should be dropped. The question of whether to pursue a bypass or seek alternative measures to reduce traffic problems in Long Stratton is a separate issue. We would prefer the latter approach, both on environmental grounds and the likely timescale in which to achieve some improvement.

#### **Easton/Costessey**

51. **Q** The JCS does not explicitly provide justification, but as for Cringleford they are urban fringe parishes close to strategic employment sites, including the city centre. There are in place decent bus public transport services.
52. **R** Connections could be improved by the proposed BRT to the city centre via the Dereham Road; enhanced bus and cycle links to City Centre, Easton College, Norwich Research Park, and secondary schools; and cycle routes and pedestrian access to the Longwater and Bowthorpe employment area.
53. **S** The housing numbers and trajectory from 2014/15 to 2021/22 are feasible.
54. **CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.**