

MATTER 3: STRATEGY AND LOCATIONS FOR MAJOR GROWTH IN THE NPA
REPRESENTOR REFERENCE NUMBER 8547

**EXAMINATION INTO THE JOINT CORE STRATEGY (JCS) FOR BROADLAND, NORWICH AND SOUTH
NORFOLK PRODUCED BY
THE GREATER NORWICH DEVELOPMENT PARTNERSHIP**

**RESPONSE TO INSPECTOR'S QUESTIONS AND MATTERS FOR THE FORTHCOMING EXAMINATION
INTO THE JCS**

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ON BEHALF OF EASTON LANDOWNERS CONSORTIUM (8547)**

**MATTER 3: STRATEGY AND LOCATIONS FOR MAJOR GROWTH IN THE NPA (POLICIES 9 AND 10,
AND APPENDIX 5), INCLUDING CONSIDERATION OF RELATED ACCESS AND TRANSPORTATION
ISSUES (POLICY 6) AND OTHER INFRASTRUCTURE ISSUES**

PART A – OVERALL DISTRIBUTION OF GROWTH

(A1) Are the absolute and comparative quantities of growth distributed to the main locations most appropriate and are they founded on a robust and credible evidence base?

1.1 On behalf of Easton Landowners Consortium, we have made submissions to the JCS process to support the overall Growth Strategy within the Plan. There is no doubt that there are significant challenges to deliver this strategy but the question at this Examination must be to agree the overall strategy whilst acknowledging that the solutions to deliver it will require further consideration and in the most appropriate context, e.g. the local councils' Development Plan Document. In respect of the reference to Easton/Costessey, we fully support the JCS in terms of its identification of at least 1,000 houses in this location given the reasoning and justification already contained within the document and in the background information contained as part of the evidence base. As previously mentioned in representations we have made to other Matters to the Examination in Public, the level of growth and the development locations identified as "Growth Locations" reflect the need to have a robust approach to ensure deliverability and which is why as a strategy based on the development of sites within the urban area, the urban fringes as well as identified towns and villages beyond the City is an entirely appropriate strategy to adopt.

1.2 From Easton Landowners Consortium perspective, we can confirm that as far as the JCS is concerned in this Examination, there are no overriding concerns about the delivery of significant new houses at Easton, setting aside whatever numbers that would come forward at any future detailed analysis stage. For the record, it is the case that our client's land interests could accommodate all of the 1,000 dwellings identified for Easton/Costessey but we do not consider this to be a specific issue at this Examination. Indeed, we would also comment that the JCS provide further flexibility on housing figures at Easton/Costessey since there are a further 1,800 dwellings referred to in Policy 9 of the JCS which could be directed towards main growth locations of which Easton/Costessey is one. From our client's perspective therefore, the absolute and comparative quantities of growth distributed to the main locations across the plan area are based upon the credible evidence base and furthermore, the case for development at Easton/Costessey is similarly supported by the work undertaken to date by both GNDP and the promoters of those developments.

(A2) Is this pattern of development deliverable in infrastructure and market terms?

1.3 The issue of infrastructure and its relevance to the JCS cannot be disentangled. The provision of water supply, sewage treatment and highways are major issues to address within the Plan period and such challenges will surely need to be addressed over the coming years. In such a context, we are certainly hoping that the relevant organisations (the Environment Agency and Anglian Water) will be represented at the Examination. We understand that up to date Position Statements will be submitted in order to assist the Inquiry. In such a context, we accept that many of the growth locations within the Strategy have common challenges to face, not least of which are the connections to the Whitlingham Sewage Treatment Works and also to the potable water supply at Heigham. Whilst such matters are clearly important as far as our client is concerned (Easton Landowners Consortium) we take some comfort from the recent GNDP response to the Inspector's requirements in relation to Issue 3 "the distribution of development", in particular in relation to public transport opportunities. In the context of wastewater disposal, paragraph 4.34 of the document stated:

"The Water Cycle Study also concluded the need for two strategic trunk sewers to link opposed growth areas to the west/south west and to the north east of Whitlingham WWTW, which has sufficient spare capacity to accommodate the needs of the JCS growth. Informal discussions with Anglian Water have suggested that there may be more easily delivered alternative options to serve growth to the south west and west of Norwich."

1.4 In terms of highways, there is a recognition that improvements will need to be made at Easton to improve access to Longwater and the Easton junctions. This strategy acknowledges that these matters are important in terms of future development in these locations and for the purposes of this Examination, that is entirely appropriate. Solutions to address this matter remain in hand and these will come forward as part of the continuing work on South Norfolk's DPD and submissions to that document as well as any potential planning applications at Easton/Costessey.

Easton Landowners Consortium confirms their support for the JCS and the specific reference to 1,000 dwellings at Easton/Costessey. There are no “show stoppers” to the Strategy being adopted and we fully support the retention of this growth location within the Plan.

(A3) What flexibility exists within the overall Strategy to accelerate/defer development in particular locations if circumstances make this necessary?

Is the JCS sufficiently clear on this point and how such flexibility would be achieved?

1.5 Appendix 6 of the JCS contains a significant amount of analysis of annual delivery rates and requirements and then projects figures for each of the growth locations by seeking to establish the total number of units coming forward per year at each of those locations. The figures within the “Growth Locations” table are purely indicative and thus there is an inbuilt flexibility to the rate of housing coming forward simply because of the nature of projecting rates over a long period of time. In such a context, the table does of course suggest that each of the growth locations (apart from the Rackheath eco-community) will come forward at 2014. Clearly there will be a slippage of dates between all of the locations and a danger of over supply will certainly be diluted.

(A4) What is meant in practice by paragraph 6.17 (under the heading “Key Dependencies”) “There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth”. Does the JCS clearly identify such key dependencies in respect of each growth location? Or effectively identify the mechanism(s) through which dependencies will be identified?

1.6 In considering the meaning of paragraph 6.17, we have assumed that the authors are merely seeking to confirm that any planning permission granted for those sites listed in Policy 10 have adequately addressed the need to provide necessary and relevant infrastructure for the development in question. Delivery will be sought through Section 106 Agreements and the relevant legislation associated within any new Community Infrastructure Levy. In respect of the second part of the question, Policy 10 lists the locations for major new or expanded communities in the Norwich Policy Area of which Easton/Costessey is one. The beginning of the policy lists the general aspirations for all of the specific growth locations and then follows this with specific reference to each development. In respect of Easton/Costessey it confirms that the location is dependent upon capacity expansion of the A47 Longwater junction and then proceeds to identify certain component parts needed as a result of the development of “at least 1,000 dwellings” at this location. Setting aside concerns and representations that Easton Landowners Consortium have already made in respect of the Bawborough Lakes reference, all of these matters are acknowledged and will need to be the subject of further consideration at the DPD stage. As such, we consider that the references in this policy and throughout the Strategy to the “key dependencies” as it reflect our clients land interest and those at the differing growth locations are sufficiently clear for the purposes of this strategy to delivery growth over the plan period.

Easton/Costessey

(Q) Does the JCS make clear, justified and effective growth proposals for this location? Can growth here take place in the form of an appropriate extension keyed into effective public transport connections?

- 1.7 Easton College, the Royal Norfolk Agricultural Association (RNAA) and the Diocese of Norwich have been working together to develop a vision for the expansion of the settlement of Easton and to improve the educational facility 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. The reference to Easton/Costessey as a Location for Growth is supported in terms of securing the development within the JCS.
- 1.8 In assessing the reference to “clear, justified and effective” growth, it is considered appropriate to deal with each of these matters in turn.
- 1.9 In terms of “clear” proposals, the spatial vision contained in Chapter 04 of the JCS sets out the broad strategy to secure at least 36,740 homes within the plan period of which over 33,000 will be in the Norwich Policy Area. Easton/Costessey is an integral part of the vision since it is one of the named Growth Locations where large scale growth will take place. Policy 9 of the JCS confirms that the NPA remains the focus for major growth and development and in the context of identifying relocations to deliver growth within that area it refers to 1,000 dwellings at Easton/Costessey whilst confirming within the same policy that the 1,000 dwellings reference are the minimum number of dwellings to be delivered in this location. In such a context, it is important to acknowledge that some 1,800 dwellings are also referred to in this policy which form the South Norfolk smaller sites provision and which could provide an addition over and above the identified provision for Easton/Costessey given that it is a named Growth Location.
- 1.10 In terms of “justified” proposals, there are a substantial amount of background papers which contribute to the evidence base for earlier proposals at Easton/Costessey which look originally to provide some 2,000 dwellings in this location. A reduction in numbers we understand was as a result of some concern about the levels of secondary provision but such a reduction is not the subject of any objections as far as our client is concerned.
- 1.11 As existing communities, Easton/Costessey is entirely appropriately identified as a new Growth Location and provides the opportunity to secure new housing provision and enhanced community provision in such a location.
- 1.12 Specifically in respect of Easton, the landowners have been developing a joint masterplan to guide the development of their respective estates over some considerable time and the production of the JCS provides the focus for this work. The consortium has considerable land interests on the western southern and eastern edges of the existing settlement to provide significant expansion opportunities

for the benefit of Easton village as well as Easton College, the latter being quite appropriately acknowledged as an important educational provider within the tertiary education sector (paragraph 3.10 of the JCS).

- 1.13 Given its prominent role and the fact that the College continues to make substantial investments (in excess of £10,000,000 in the last ten years) in developing its resources to enable growth in student numbers as well as addressing a current and future skills needs, the development at Easton provides an opportunity to assist in securing the long term strategic location of the College having regard to its existing credentials:
- (a) it is centrally located and is close to the major public transport hub for the County;
 - (b) it is close to the most significant volume of population;
 - (c) its environment and range of resources is good;
 - (d) its close proximity to both UEA and the Norwich Research Park are invaluable in terms of long term partnerships and land based and environmental issues and;
 - (e) there is considerable synergy between the mission and activities of the College and the charitable objectives and activities of the RNAA.
- 1.14 Concerning the RNAA, they own and operate the relevant Norfolk showground and is perhaps best known for organising the annual Royal Norfolk Show. Given the charitable status of the RNAA, its objectives require any financial surpluses achieved from the activities to be used in the delivery of its charitable objectives and these are to promote improvement in all farming systems, to encourage and promote agricultural science, research and education and to advance and encourage the protection of safeguarding the environment. There is clear benefit in terms of the links between these organisations.
- 1.15 With regards to the village of Easton, the settlement has a number of local facilities including a primary school, a post office, local eating establishments and a range of open space provision. Key issues that have arisen as a result of local consultation exercises have been the need for better facilities for the village, affordable housing and improved access to facilities at Easton College, together with a longstanding desire to secure a new village/community hall but at a time when identifying the funding has not come forward.
- 1.16 There is thus a collective view to move forward within the consortium to look at expansion of the village which will seek to maintain and enhance its form and character, support additional facilities whilst providing for better highway circulation and improvement and services. To this end, the planning approval for a new road access on the eastern side of the village to Easton College will have significant benefits to the village and which forms part of the larger strategic proposal for expansion. A well planned strategic growth proposal at Easton will be effective in terms of assisting and enhancing village facilities as well as securing and enhancing the opportunities for both the College and the RNNA. We therefore consider that the JCS has properly considered the issues of development as far as Easton is concerned and having regard to the lengthy history of identifying

growth at the Easton/Costessey location, we support the approach taken by the JCS in response to this identified growth location. In terms of the question of whether growth can take place in the form of an appropriate extension keyed in to affect the transport connections, we feel that this can be achieved, both in terms of the enhancement of facilities for both pedestrians and cyclists within the settlement but also in addition to surrounding areas. In terms of recreation use, there are public footpaths together with the woodland trail. In addition, there is a signed on-road cycle route provided in the village of Marlingford, approximately 1.5 kilometres south of the Easton village and which provides a cycle route towards Norwich City Centre where a selection of other cycle routes, including sections of traffic-calming can be accessed.

1.17 There are six bus stops within Easton village where the X1 and four other services are available from these stops. The X1 provides a half hourly service to Norwich where the number 4 service provides an hourly service to Norwich via the Norfolk and Norwich University Hospital, the Norwich Research Park and the University of East Anglia.

1.18 In terms of current vehicle access and circulation, the A47 lies to the north of Easton and forms a key access route to Easton from Norwich and Kings Lynn. Vehicles travelling to Easton use both the Easton roundabout and Longwater junction. Policy 10 of the JCS acknowledges that development at Easton/Costessey is dependent upon the capacity expansion of the A47 Longwater junction with solutions to provide this additional capacity will quite appropriately be addressed at the more detailed stages of planning. We also acknowledge that new development at Easton/Costessey will need to provide the necessary links to the Bus Rapid Transit to the City Centre via Dereham Road, such measures will be important in the light of existing and planned new residencies.

(R) What are the critical infrastructure dependencies of this location and can its delivery take place within the timescale set out on page 111 of the JCS?

1.19 In terms of the critical infrastructure dependencies as it relates to Easton/Costessey reference to such issues are to be found in different locations within the document. Policy 10 specifically relates to the capacity expansion of the A47 Longwater junction and there are references within Appendix 7 on the implementation framework to the need to secure water, electricity and gas services to this development location. As previously mentioned in other submissions to other matters, we are aware that updated Position Statements are anticipated from service providers and we consider that these will be helpful to the Inspectors during the course of the Inquiry.

1.20 Future development at Easton/Costessey forms an important component part of the Plan and relative to other locations; it is considered that development in this location can be deliverable at the earlier stages of the plan period. In such a context, we do not consider that the highway improvements nor infrastructural links required and identified in the Plan should be considered as “show stoppers” and thus the strategy for the identified scale of development at Easton/Costessey is robust.