

**Matter 3a: Overall distribution of growth**

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

1. In accordance with PPS1, the JCS focuses growth in existing urban areas. Additional growth required to deliver housing and employment needs which can not be accommodated within existing urban areas has been allocated to land in North East Norwich. This is the most sustainable location for growth taking account of the need to reduce the need to travel in terms of links with existing transport networks, close proximity to the city centre and other existing employment centres, in particular the Broadland, St Andrews and Meridian Business Parks as well as local services and amenities as well as ensuring development is located appropriately with regard to impacts on climate change. As stated in previous representations to the JCS, the TFT support the identification and distribution of growth to the Old Catton, Spowston, Rackheath and Thorpe St Andrew growth triangle as the most sustainable, accessible and coherent location for growth as it offers the best opportunity:
  - a To link growth with the City of Norwich enabling the organic progression of the urban pattern of Norwich as this area has strong links with the city, rather than creating isolated communities.
  - b To link growth to the established business parks which employ over 4000 people and are the second centre of employment in the county, potentially reinforcing the city's economic proposition as well as encouraging a shift to more sustainable travel patterns;
  - c To link growth with planned and potential opportunities for strategic transport improvements, including opportunities to incorporate rail, bus and park and ride services, create a link road and connect to the NDR;
  - d Link together existing services, facilities and employment areas with existing and new residential communities;
  - e To introduce a mixture of uses to support the presently underserved daytime working population of the business parks which will also benefit the wider catchment residential populations ensuring viability through critical mass of users;
  - f To enhance and extend the natural landscape and integrate this with new development to provide a valuable recreational resource to new and existing communities creating a high quality lifestyle proposition;
  - g To enhance linkages with the countryside creating a new urban/rural interface providing new opportunities for public access, recreation, local food and fuel sourcing, enhanced biodiversity and land management;
  - h To develop a significant number of homes in a sustainable manner;
  - i To accommodate social infrastructure that will have benefits for existing as well as new communities; and
  - j To make the most of the attraction of the Broads and the coast;
  - k To create distinctive high quality sustainable communities and a network of local centres serving existing and new communities. This promotes the concepts of sustainable urbanism and walkable neighbourhoods.
  
2. Land has been identified and promoted in this area that can deliver 10,000 new homes in accordance with the JCS. It is considered that a comprehensive and robust evidence base has been compiled which supports the quantity of between 7,000 – 10,000 new homes in the Growth Triangle.

**Question A2** : *Is this pattern of development deliverable in infrastructure and market terms?*

Transport

3. In the GNDP's response to the Inspector's requirements arising from the JCS Exploratory Meeting (Issue 1: Infrastructure), the NDR is identified as fundamental to enable physical growth and that the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle is dependent on its delivery. The GNDP have amended Appendix 7 to the JCS to reflect this
4. Whilst the benefits of the NDR are recognised in terms of acting to relieve pressure on arterial routes into and across the city, creating better access to the airport and providing more direct links to the regional and national road network, its delivery is currently uncertain.
5. Paragraph 4.4 of PPS12 states that the delivery strategy of the Core Strategy is central and it needs to show that the resources required for its delivery have been given due consideration and have a realistic prospect of being provided in the life of the strategy. In addition, paragraph 4.46 of PPS12 states that a strategy is unlikely to be effective if it cannot deal with changing circumstances and that plans should be able to show how they will handle contingencies. Further it states that the core strategy should show what alternative strategies have been prepared to deal with uncertainty. It is this lack of alternatives, not necessarily the primary objective of allocating the NDR, that is at issue in our submission.
6. Although the NDR has received ministerial support no firm commitment to funding has been received. In their responses to Matter 3b, the GNDP have confirmed that they consider that any delay in the provision of the NDR would result in delay in the delivery of further growth in the Growth Triangle. Conversely, however, the GNDP also state in their responses to Matter 3b that the NDR is not in itself the primary means of providing access to the Growth Triangle and that it will be built in the existing transport linkages to the city and local services and employment areas. As such, the delivery of growth is not dependant in the implementation of the NDR and there are alternative strategies that will enable the delivery of growth in advance of the NDR.
7. As stated in previous representations to the JCS, the TFT along with other neighbouring landowners have identified a route for an inner link road connecting to Salhouse Road and Plumstead Road which has been safeguarded in part within Broadland District Council's existing Local Plan. A section of this inner link road has extant planning permission as part of the White House Farm Development. The provision of the link road will enable the delivery of the urban extension in advance of the NDR as it will act to support north/south traffic, cycle and pedestrian movements around the periphery of Norwich and within the fabric of a new urban extension and encourage orbital movements between the Broadland Business Park to the south and Wroxham Road to the north, thus relieving pressure on existing arterial routes. It would also create easier access to the park and ride facility on the Wroxham Road, potentially encouraging more people to use this facility and in turn, reducing commuter traffic into the city. This will address the problems of congestion, delay and vehicles using unsuitable roads that the GNDP use as justification for the strategy for the NDR.
8. It is considered that this proposed link road can be delivered through developer contributions without the requirement for public sector funding and will enable the delivery of a significant amount of growth in the north east sector in advance of the NDR. The TFT carried out a master planning exercise with local stakeholders through a Charette held in July 2010. This identified that circa 700-800 new homes could be brought forward as part of a sustainable urban extension on TFT controlled land alone.

9. No justification has been provided by the GNDP as to why the inner link road should not be recognised and included in the JCS as a viable, deliverable and reasonable alternative strategy that can come forward in advance of the NDR to enable the delivery of growth in a timely manner. The recognition of this alternative strategy within the JCS will result in an effective, flexible and deliverable strategy with regards to its approach to transport infrastructure.

Other infrastructure requirements

10. In the GNDP's response to the Inspector's requirements arising from the JCS Exploratory Meeting (Issue 1: Infrastructure), water, electricity and transport infrastructure have all been identified as priority 1 infrastructure i.e. those infrastructure requirements that are considered fundamental elements to enable physical growth. Transport is addressed above. In terms of water infrastructure, the GNDP identify this as water capacity, sewerage and in terms of electricity, new grid or sub stations. For the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle the priority infrastructure is identified as connection to existing sewerage and new sub-stations. It is considered that the cost of these will be achieved through developer contributions, the mechanisms of which will be subject to further assessment and coordination with regard to the development of an AAP. This approach is supported.
11. The TFT propose that a partnership approach between the public sector and property interests in the area will lead to the development of a viable funding model for the delivery of critical infrastructure which will be phased according to capacity of development and funding markets.

Market

12. Paragraph 1.4.14 of the Housing Market Assessment (2007) shows that 85% of the population that live in the Norwich Housing market area also work in that area and as such, the Norwich Market is very self contained and that nearly all work journeys start and end within the Norwich market area. As such, the journey distances are shorter. This demonstrates that the location of new homes in close proximity to Norwich and existing employment sites is a sustainable approach to growth in terms of access to jobs.

**Question 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?*

13. Flexibility to accelerate development within the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle could be achieved through the recognition and inclusion of the identified inner link road within the JCS as part of a viable and deliverable alternative transport strategy that would enable the delivery of a significant amount of growth in advance of the NDR.

**Question A4:** *What is meant in practice by para 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 such dependencies will be identified?*

14. In the GNDP's response to the Inspector's requirements arising from the JCS Exploratory Meeting (Issue 1: Infrastructure) they have identified what are considered to be the 'key dependencies' for each growth location. TFT's response to the NDR is outlined under question A2 above. In terms of the other dependencies identified the GNDP state that the information is indicative and is likely to vary in the light of future economic, market and



policy changes and that these will be subject to periodic review. It is expected that any review be undertaken in consultation with key stakeholders in the development of further DPDs to be prepared by the 3 authorities, which will set out further master planning principles and criteria for development to follow.