

## Matter 3 Strategy and Locations for Major Growth

### Part A – Overall distribution of growth

**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. No.

In general terms, NNTAG agrees with CPRE Norfolk that the housing allocation is excessive for Norwich Policy Area and we endorse CPRE representations on this issue.

Housing numbers for NPA should be revisited in light of new financial and political circumstances. There are already 12,500 existing permissions for new dwellings in the Norwich Area which have yet to be built. Based on historic completion rates, the current housing allocation is too high for market conditions. The recession has dampened house purchases and mortgage availability and will continue to affect future growth rates.

The GNDP plans to start work on reviewing the JCS and housing numbers this December which suggests that they consider the strategy to be out of-date if not unsound.

2. In relation to the question, NNTAG considers there is an imbalance in the present distribution of growth:

- an over-allocation of growth concentrated in north-east Norwich;
- an imbalance to SW compared to NE and growth dispersed rather than being more concentrated for supporting public transport.

There should be a better balance of growth between SW and NE rather than the current strategy of piling more growth in the north-east where it extends to Rackheath.. The housing allocation in the NE should not exceed 5,000 – 7,000 dwellings.

Wymondham/Hethersett is:

- better placed geographically - on A11 corridor/national railway line to Cambridge, London and East Midlands and close to A47 Southern Bypass. Hethersett is not far from the Norwich to London mainline via Ipswich and there is potential for re-opening the former rail halt.

- close to existing strategic employment sites to SW of City (University, District Hospital and Research Park, all of which are proposed for expansion).

- for these reasons, it has a better fit with national and local policies.

The current growth distribution pattern is not based on a robust and credible evidence base for the reasons outlined in NNTAG Statement 1B.

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

No. The current development pattern, predicated on a NDR, is much more expensive in terms of provision of infrastructure terms and undeliverable in present economic climate.

Relocation of Salhouse railway halt to Rackheath, whilst essential for serving an adjacent eco-town is unlikely in the short/medium term and in any case rail services on the local Norwich to Sheringham railway line will not match the current frequency of trains on the Norwich to Cambridge/Ely line.

Aside from question of whether Long Stratton is a suitable location for 1,800 new dwellings (and NNTAG considers it to be unsustainable), this number is insufficient to fund a £35 million bypass as well as other infrastructure. Apart from developer contributions, there are no other available sources of funding.

NNTAG is concerned that the market will be unable to meet reliance on expensive major road infrastructure where funding is partly reliant on developer contributions will eat up funds for sustainable transport measures and for infrastructure other than transport.

A better balance of growth would remove the JCS dependency on a NDR, support high quality public transport in the A11 corridor, to include bus infrastructure improvements across A47 Southern Bypass at Thickthorn junction and free up money from the Community Infrastructure Levy fund for essential infrastructure other than transport.

**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?**

Not much flexibility if the current JCS hinging on a NDR is adopted, especially if Government funding for NDR/Postwick Hub is withdrawn.