

Statements on behalf of The Fairfield Partnership

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

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. The proposals for the distribution of growth in the JCS are not the most appropriate strategy, when assessed against the Sustainability Appraisal, or the wider evidence base. It is clear that the proposed development in Long Stratton, which is required simply to help provide a bypass for the town, is contrary to the principles of sustainable development, and even the objectives of the JCS, which seek to allocate development to the most sustainable settlements and reduce travel need and impact.

Maximising the Potential for Modal Shift to Public Transport

2. The proposed bypass for Long Stratton will make the A140 a more attractive route for commuters, particularly those travelling long distances from beyond Long Stratton in the direction of Norwich, and is thereby likely to increase traffic on this route. In addition, the new development proposed at Long Stratton is also likely to significantly increase car journeys, given the village's isolated location and relatively poor public transport connections.
3. While these proposals represent a particularly ambitious level of development for the village, more than doubling it in size, the GNDP's evidence base notes that developments of less than 2,000 dwellings, such as that proposed at Long Stratton, **'may be too small to effectively implement the concept of Public Transport-Orientated Development, and it will be difficult to achieve a step change between the public transport mode share for the new developments and the existing public transport mode share for travel from these areas to Norwich.'**¹
4. Based on the proposed level of growth in Long Stratton, Document T3 concludes that there will be insufficient demand for a Bus Rapid Transit (BRT) service at Long Stratton, and the development should be delivered **'through the extension and enhancement of existing bus services.'**
5. Document T3 also considers the potential for a BRT service on the A11 corridor, which served the settlements of Wymondham, Hethersett and Cringleford. Based on the minimum level of growth proposed for these settlements (4,400 dwellings) it concludes that **'there is a potential market that may be just sufficient in size to support the development of a Bus Rapid Transit service...'** It adds that **'Increasing the total housing allocation for Wymondham, Hethersett and Cringleford to 5,000 would**

¹ 'Technical Note – Appraisal of Emerging Option' (December 2008) (Document T3)

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provide greater comfort regarding the market potential for BRT on this corridor.'

6. In actual fact, the JCS already proposes a level of growth in excess of this minimum 4,400 dwellings , via the mechanism of the South Norfolk 'non-strategic/smaller sites' allowance, although the precise number of additional units for the A11 corridor will be determined through the Site Allocations DPD.
7. What is clear from the findings in Document T3 and the subsequent Pre-Submission draft Sustainability Appraisal, is that there is far less potential to achieve a modal shift from private cars to public transport in Long Stratton than there is in the A11 corridor, and the construction of a by-pass will make modal shift less likely, not more likely .

Justification for Development in Long Stratton

8. The GNDP's explanation of the rationale for the proposed development in Long Stratton² presents a de facto justification, which is not consistent with the available evidence. The GNDP seek to play down the conclusions of the sustainability appraisal process which accompanied the selection of the JCS preferred option, as far as it relates to the poorer performance of 'Option 2' in relation to the more sustainable 'Option 1', and their case is essentially that the inclusion of Long Stratton does not fundamentally undermine the sustainability of the JCS, and that other factors have been taken in to account.
9. Given the primacy that PPS12 places on the evidence provided by the Sustainability Appraisal process, and the requirement under the tests of soundness for the Core Strategy to be "the most appropriate strategy" (i.e. the best it can be, rather than just acceptable), we do not consider that the GNDP's response on this matter provides sufficient justification for the selection of the modified Option 2 as the preferred option, and no credible planning or sustainability reason is given for having disregarded Option 1.
10. Paragraph 6.1 of Document DP6 notes that the preferred option was selected on the basis of 'political wishes reflecting local accountability' and 'the potential results of the ongoing work to mitigate certain potentially negative effects'.
11. With regard to 'local accountability', this conclusion contrasts markedly with the findings of the Issues and Options Sustainability Appraisal³, which noted a mixed response to proposals for major development in Long Stratton. While 68% of respondents to Q32 of the Issues & Options questionnaire⁴ supported development that would deliver a bypass, a separate survey of local residents conducted by South Norfolk Council '**came out very marginally against**

² Appendix 6 of Document BP6

³ Document EIP12

⁴ Q23 asked 'Should the Joint Core Strategy promote major mixed use growth at Long Stratton to improve that section of the A140?'

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support for major growth to improve the A140⁵. This does not support the claim that there was evidence of strong local support for development in Long Stratton.

12. The 'ongoing work to mitigate potentially negative effects' of development is set out in the GNDP's 'Vision for Long Stratton'⁶. This aims for an 'ambitious degree of self-containment', but does not provide any evidence that this can be achieved.
13. The essential problem with this approach is that achieving self-sufficiency as the mechanism by which long-distance car travel for higher order services and jobs is limited is well-nigh impossible for a settlement of this size, as previous research and evidence has consistently shown.
14. It may be possible to provide additional employment in Long Stratton, but achieving self-containment is not about having an equal number of jobs and homes, but having a sufficiently large and diverse range of jobs and a sufficiently large population such that the range of vocations of local residents are reflected in the range of local employment opportunities.
15. Even if it were possible to achieve employment self-sufficiency, this is only part of the issue, because a self-sufficient settlement also has to provide all of the services that its population requires on a day to day basis, including secondary and higher education, leisure facilities, health facilities etc, which no village can sustain. This is why good practice and guidance in respect of new settlements and sustainability has repeatedly pointed to the benefits of larger scale developments.
16. Long Stratton may be a local service centre, but it is nowhere near being a self-contained settlement, and nor will it be with an additional 1,800 homes. It is unrealistic to assume that the proposed development can achieve this, and the GNDP's use of the word 'ambitious' is an understatement.

Proposed Alternative Strategy

17. We set out in our response to Matter 3C, and particularly 3C/P the ways in which the proposed growth within the JCS area, and specifically that within South Norfolk, can be more appropriately distributed to produce a more sustainable and deliverable strategy, which is more soundly rooted in the evidence base and the Sustainability Appraisal.

⁵ Long Stratton survey Q1 – Against major development = 49.6%; for major development = 48.2%

⁶ Appendix 6 to Document BP6

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

18. The JCS acknowledges that **‘the cost of required infrastructure is likely to exceed income from all sources’** (para 7.4). This clearly implies that there is a need to prioritise certain elements of infrastructure, and perhaps also certain developments, where this will allow the overall spatial strategy to be implemented most effectively, or at all. In order to ensure the timely delivery of housing, it is also vital to minimise the cost of infrastructure, and reduce the funding burden for new development, by making efficient use of existing infrastructure.
19. Paragraph 4.1 of PPS12 notes that Core Strategies must include a **‘delivery strategy’**, which **‘should set out how much development is intended to happen where, when, and by what means it will be delivered’**. It also notes that they must set out **‘clear arrangements for managing and monitoring the delivery of the strategy’**.
20. Paragraph 7.2 of the JCS defers the issue of prioritising and managing the delivery of infrastructure and development to a subsequent delivery programme, to be developed through the LIPP. The Core Strategy does not itself contain any specific mechanism through which different developments or elements of infrastructure will be prioritised. However, we welcome in principle the development of the draft LIPP⁷, as it can form a valuable tool for delivering the JCS. We have made more detailed representations on the draft LIPP in our representations on Matter 5.

Proposed Development in Long Stratton – Delivering the bypass

21. No public funding source has been identified, or is likely to be identified, for the proposed Long Stratton bypass, which is a prerequisite for *any* development in the village. The GNDP’s response to the Inspectors’ questions of 9 April⁸ noted that commitments were being sought from landowners regarding its delivery, but it is difficult to see how this could be achieved in practice.
22. The housing trajectory in the JCS assumes that the bypass will have been completed in time to deliver housing in 2018/19. This would require advance funding, and Chapter 6 of GNDP’s draft LIPP notes that a CIL or Tariff on new developments within the JCS area will be used to fund critical infrastructure.
23. Given that the development at Long Stratton is highly unlikely to be able to forward fund this infrastructure, it must be funded by development in other areas. This raises a number of unanswered questions, including:
- To deliver a completed by-pass by 2018, a substantial sum of money will need to be taken from CIL/Tariff payments collected elsewhere to pay for the Long Stratton by-pass. Given the relatively lower scale of

⁷ Document EIP85

⁸ Document XX, Q23

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development likely in the early years of the Plan, and the pressing infrastructure costs relating to development in other parts of the NPA, there is no certainty that sufficient funds will exist to enable construction in time;

- Any substantial diversion of CIL/Tariff funds to Long Stratton must have an impact on the availability of funding for other strategic projects in the GNDP area, and therefore supporting delivery at Long Stratton in this way is likely to have knock-on effects for delivery elsewhere;
- There is no certainty that the development proposed for Long Stratton will in due course be capable of repaying the entirety of the cost of the by-pass, such that other developments would in effect be subsidising Long Stratton (or whether other s106 contributions at Long Stratton will be reduced to assist spending on transportation infrastructure);
- Whilst contributions to strategic infrastructure required generally to support development in an area would comply with the principles for commuted sums, it is far more tenuous to develop a strategy whereby in effect developers from one area pay towards infrastructure required for another, where there is no functional linkage between them . We believe that this would be contrary to the current CIL guidance.⁹

24. Overall, the JCS and its evidence base therefore fails to offer any certainty that a bypass, or other critical facilities, can be delivered in Long Stratton, and this aspect of the JCS therefore fails to comply with the requirements of PPS12 noted above.

Waste Water

25. In addition, Policy 10 of the JCS also notes that the proposed housing at Long Stratton is dependent on ‘**overcoming sewerage constraints**’. The recent Water Cycle Study Stage 2b¹⁰ that the existing waste water treatment works (WwTW) at Long Stratton currently has capacity to meet the requirements of a further 1,430 dwellings¹¹. The Study seeks to identify a strategy for maximising the use of existing infrastructure wherever possible, for instance by redirecting development to alternative WwTW, but concludes that this is not practical or affordable for Long Stratton. It notes that if the local WwTW is

⁹ See the Community Infrastructure Levy Regulations 2010, 122(2);

(2) A planning obligation may only constitute a reason for granting planning permission for the development if the obligation is—

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

¹⁰ Document XX

¹¹ Document ENV 4.4a, Table 3-2, p14

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required to accommodate a total of 1,927 dwellings¹², it will be running at 115% of its current capacity, and 'innovative solutions' will be needed to provide the additional capacity required.

26. In order to deliver improvements to the WwTW, the works must be programmed into Anglia Water's Asset Management Plan (AMP) for 2015-20. Only once funding is secured under the AMP can the design and construction of a solution be realised. However, while the need for this work is mentioned in Document EIP85, it is not identified in the subsequent schedule of necessary infrastructure. The timeframe for undertaking the necessary improvements to the WwTW is unknown, and has the potential to limit the development of any more than 1,430 dwellings at Long Stratton to beyond the end of the plan period.

Potential for Development in Wymondham and the A11 Corridor

27. We believe that a more efficient use could be made of the limited resources available by relocating the development proposed for Long Stratton elsewhere within South Norfolk. The original Option 1, as proposed at the Regulation 25 Technical Consultation stage, proposed 4,000 dwellings at Wymondham, and another 4,000 at Hethersett and Little Melton, making a total of 8,000 units on the A11 corridor, while no development was allocated to Long Stratton. This option was rated more highly than the GNDP's preferred option by the Sustainability Appraisal, both at the time, and at the latest Pre-Submission stage. It offers a clear alternative to the proposed development at Long Stratton.
28. There are a number of advantages to adopting a new approach which moves the Long Stratton development to Wymondham. As noted in our response to Matter A1 above, development in this area has the potential to contribute to shared infrastructure, such as a Bus Rapid Transit service, or improvements to the Thickthorn junction, which will benefit all of the existing communities and new development areas along the A11 corridor. Similarly, existing infrastructure, such as the WwTW at Wymondham and the local A11 junctions have the capacity to support additional development now. This would allow a significant amount of development to take place in advance of any necessary upgrades to this infrastructure, and this would in turn provide the advance funding and basis required for the new shared infrastructure to be delivered.
29. Further to this, Wymondham in particular is already a far more sustainable location for growth than Long Stratton, and offers a more realistic prospect for achieving a degree of self-containment and modal shift, which can lead to more sustainable travel patterns. It has an existing rail connection to Norwich, and with a BRT service will have far superior public transport connections to those on offer at Long Stratton. It also has a larger centre, and a better range of shops and facilities.
30. We outline in our response to Matter 3C/P the ways in which the proposed development for Long Stratton could alternatively be distributed by the JCS.

¹² This is the figure the WCS gives, which is the proposed allocation plus existing commitments

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- 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?*
31. We believe that the JCS already contains elements of flexibility that will help it respond to changes in the plan period.
32. Firstly, by spreading development across a number of sites in a number of locations, the strategy of the JCS is already inherently seeking to minimise the risks of over-reliance on a limited number of strategic locations.
33. Secondly, there is additional flexibility provided by the 'Broadland smaller sites in the NPA' and 'South Norfolk smaller sites in the NPA and possible additions to named growth locations' identified in Policy 9 to further broaden the distribution and variety of sites available for delivery.
34. Thirdly, whilst Windfall development is not relied upon to meet the overall scale of growth planned for in the Core Strategy, it is likely to be the case that additional development sites above and beyond those allocated in DPDs will continue to come forward to boost supply.
35. Fourthly, all of the strategic growth locations are allocated a minimum level of new housing, not a maximum level. In due course, through subsequent Site Allocation DPDs/AAPs, it will be possible for the scale of growth at deliverable locations to be increased, to take account of any future problems of non-delivery, and it is likely that such subsequent DPDs will need to take account of the possible need to increase supply at key locations when site specific proposals are considered.
- 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?*
36. It is clear that if land cannot be released for major growth prior to a commitment to fund key infrastructure, it will be necessary to identify, as far as possible, what the key infrastructure is, as far as possible its true cost and the likely timescale for its delivery. As drafted, the JCS and the emerging LIPP fail to do these things. We have set out in further detail our views on Appendix 7 of the JCS, and the draft LIPP, in our representations on Matter 4.
37. We suggest that Appendix 7 of the JCS should be expanded to list all of the items of infrastructure which are critical to the delivery of the JCS, with detailed information relating to their cost, the timing of their delivery and the



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means by which this will be achieved. The JCS should also be accompanied by a LIPP, which can be updated throughout the plan period, to help manage development over time. In our opinion, this could help meet the PPS12 requirement for the JCS to be supported by a 'Delivery Strategy'.

14 October 2010