

**Matter 3b: Old Catton/Sproston/Rackheath/Thorpe St Andrew Growth Triangle (part policy 10 and appendix 15)**

Procedure

**Question B1:** *In principle (aside from any comments about its content), do policy 10 and appendix 5 (as amended by GNDP Focussed Changes 8-10, including the concept statement) provide a sound procedural basis for the strategic allocation of the growth triangle and an appropriate level of guidance for taking its development forward in a coordinated way without an AAP through future detailed master planning of the various 'quarters'?*

1. It is understood that the focused changes relating to the Growth Triangle are no longer part of the proposed JCS and that the GNDP have reverted back to the position set out in policy 10 of the submitted JCS. In response to the Inspector's comments made at the Exploratory Meeting, the GNDP have now decided to progress with an Area Action Plan (AAP) to resolve what are considered to be differing views of landowners and to ensure coordination.
2. Paragraph 4.6 of PPS12 states that the Core Strategy may allocate strategic sites for development and sites should be those that are considered central to the achievement of the strategy. The Growth Triangle is central to the achievement of the strategy and therefore its status should be a 'strategic allocation' rather than a 'location'. This would provide more planning weight to the principle of housing and employment growth in this location and planning applications could be progressed with more confidence on this basis. There has been substantial delay in the progression of the planning policy framework in the area against the backdrop of an acknowledged housing need, housing is needed sooner rather than later. The risk of identifying the Growth Triangle as a location is that it will not provide the necessary level of certainty and comfort for developers or landowners to bring forward land necessary to deliver the JCS as its status will not possess the requisite planning weight resulting in further delay. A strategic allocation would provide developers and landowners with this comfort in advance of an AAP.
3. The allocation of a strategic site does not preclude the progression of an AAP. Indeed, paragraph 4.7 of PPS12 states that where core strategies allocate strategic sites, it may be preferable for the site area to be delineated in outline that than in detailed terms, with site specific criteria set out to allow more precise delineation through master planning using an area action plan if required. TFT do not object to the production of an AAP and fully support the aspiration to work with other relevant stakeholders (where that is practicable and achievable). TFT fully embrace the concept of master planning, demonstrable through the Charette that the TFT carried out in July 2010. However, the concern lies with the substantial period of time that it takes to produce, consult on and adopt an AAP and the associated delays that this could cause with regard to the delivery of much needed homes and jobs.
4. In June 2008, the Government introduced changes to the Planning and Compulsory Purchase Order to published a revised PPS12: Local Spatial Planning (PPS12) to streamline LDF process by reducing the stages involved with producing DPDs. It is considered that the GNDP should implement this streamlined process in producing the AAP through maximising the value of consultation undertaken and information collected through the development of the JCS and ensuring an effective and coordinated approach to engagement with relevant stakeholders. This approach should limit the amount of time that it takes to produce the AAP. A strategic allocation will provide developers with comfort to start preparing applications in advance of the adoption of the AAP, whilst ensuring that the detailed guidance, principles and criteria for development informs such planning applications so decisions can be made once the AAP is sufficiently advanced.

This will facilitate development and limit the risk of delay to the delivery of homes and jobs.

Soundness of the proposal

**Question B2:** *Is this strategic allocation justified, effective and consistent with national policy?*

5. Paragraph 4.1 of PPS12 states that LPA's should produce a core strategy that sets out how much development is intended to happen where, when and by what means it will be delivered. Further, paragraph 4.6 of PPS12 states that Core Strategies may allocate strategic sites for development and that these should be sites considered central to the achievement of the strategy. Paragraph 21 of PPS1 states that planning should actively manage patterns of urban growth to make fullest use of public transport and focus development in existing centres. It is therefore considered that the strategic allocation for the Growth Triangle is consistent with national policy. As set out above in responses to question B1 above, it is considered that the strategic allocation be incorporated within the JCS.
6. The GNDP and other stakeholders have established a robust evidence base to support the strategic allocation of the Growth Triangle. The evidence base consists of a considerable number of representations from a range of stakeholders as well as a number of documents that contain factual information that back up the strategic allocation, including reports on the environment, transport, the economy and existing and future demand for utility and service infrastructure. Through the sustainability appraisal of options for growth, the GNDP have considered and evaluated a number of reasonable alternatives to the chosen strategy. As such, it is considered that the strategic allocation is justified.
7. The TFT have previously promoted their land as part of a much larger urban extension through the Broadland Land Trust (BLT) which has been looking at effective means by which to promote the constituent land holdings collectively. The grouping has produced a number of collective representations and commissioned a scoping exercise for an Enquiry by Design (EbD) collectively. However, due to the complexity of formulating collective promotion arrangements, and the changing planning and financial context, for the purposes of the JCS, the respective landowners are promoting their land holdings separately in advance of a legally formalised consortium or partnership arrangement. However, each of the respective landowners are signed up to the principle of growth in this location. There are no known regulatory barriers that would preclude growth in this location.
8. Parts of the TFT land are allocated as a County Wildlife Site (CWS). However, the GNDP recognise that there are requirements that will need to be satisfied with regards to ensuring the protection and enhancement of areas of ecological value but that this can be done alongside the sustainable growth and through the provision of appropriate and attractive green infrastructure. The CWS is not a prohibition or, in principle, an onerous restriction. It requires an understanding of the reasons why the CWS was designated, the current land use and its impact and an understanding of the impact/benefits of a new development.
9. The GNDP and third parties have also assessed and established what infrastructure is needed to support the JCS and set out a plan for how this will be delivered. The TFT's view on transport strategy is set out above. However, the TFT have no objection in principle to the other infrastructure requirements that have been identified by the GNDP.
10. Paragraph 4.7 of PPS12 states that in general the core strategy should not include site specific detail which can date quickly. In this regard, it is considered that the strategic

allocation of the Growth Triangle in the JCS will give developers and landowners a sufficient level of certainty and comfort to bring sites forward whilst not providing too much site specific detail to ensure that the core strategy is flexible to changing circumstances. We understand that more specific criteria and guidance on the Growth Triangle will be contained within a forthcoming AAP and the TFT support a streamlined approach to the development of an AAP

11. As such, is considered that the strategic allocation of the Growth Triangle is effective and consistent with national policy.

**Question B3:** *Does the amended concept statement provide sound guidance for the development? Are the content and objectives of the two maps in the concept statement effectively communicated, or does the key need to include further explanation of the 'areas of green space' and the 'constraints and opportunities for new development'?*

12. It is understood that the GNDP have decided not to proceed with the proposed strategic allocation and concept statement and that the intention is to revert to policy 10 as set out in the proposed submission version of the JCS. It is understood that the GNDP have decided to take forward more detailed principles and guidance for growth through the development of an AAP for the Growth Triangle. Although the TFT support the development of an AAP, it is considered that the strategic allocation for the Growth Triangle is preferable and should be retained within the core strategy.

Transport issues related to the growth triangle

**Question B4:** *Is the Northern Distributor Road (NDR) justified and effective as the means of providing the 'necessary access to key strategic employment and growth locations' and releasing road capacity to achieve 'significant improvement to public transport, walking and cycling in Norwich', and particularly North Norwich (JCS para 5.44)?*

13. Paragraph 4.38 of PPS12 states the planning authority is required to seek out and evaluate reasonable alternatives. Moreover, paragraph 4.46 states that a strategy is unlikely to be effective if it can not deal with changing circumstances and that plans should be able to show how they will handle contingencies as it may not always be possible to have maximum certainty about the deliverability of the strategy. In these circumstances, PPS12 states that the core strategy should show what alternative strategies have been prepared to handle uncertainty
14. 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 dependant on its delivery.
15. As outlined above, whilst the TFT recognise the benefits of the NDR, its delivery is currently uncertain and therefore it threatens the deliverability of the Core Strategy. As stated above, in previous representations to the JCS, the TFT and other landowners have highlighted a reasonable alternative to enable some growth in the Growth Triangle in advance of the NDR in the form of an inner link road connecting Salhouse Road and Plumstead Road, which 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.
16. In their responses to Matter 3b, the GNDP states that the NDR itself is not the primary means of providing access to the Growth Triangle and that the Growth Triangle will build on the existing transport linkages to the city centre and local services and employment

areas. However, the GNPD states that there are existing problems of congestion, delay and vehicles using unsuitable routes that will be resolved by the NDR.

17. It is therefore considered that the inner link road constitutes an alternative and deliverable strategy that will enable some growth in advance of the NDR whilst the deliverability of the NDR is still uncertain. 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, which if recognised by the JCS, would make the strategy effective and justified and, therefore, sound.

#### Implementation issues associated with triangle

**Question B7:** *If the NDR is fundamental to the delivery of the JCS [para 5.44], are the resources likely to be in place to achieve it, and when? [The answer to this question may or may not become clearer after the October budget after which, if it is budgeted, an inquiry into the Postwick Hub will be required.] What would be the consequences of a possibly unknown length of delay in provision of the NDR? Does the JCS have flexibility in this respect, bearing in mind that JCS policy 10 states that 'Delivery (of the growth triangle) is dependent on the implementation of the Northern Distributor Road (NDR)'?*

18. In the GNPD'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 GNPD state within their paper of responses to Matter 3b that 'any delay in the provision of the NDR would result in delay in the delivery of further growth in the Growth Triangle.' The implication is therefore that the consequences of an unknown length of delay in provision of the NDR would lead to an unknown length of delay in the provision of new homes and jobs in the area.
19. The TFT recognise the GNPD's commitment to the NDR and acknowledge the potential benefits of the NDR. However, its delivery is currently uncertain and at present the JCS does not include any contingency plan or any reasonable alternatives to deal with the uncertainty over the delivery of the NDR. As currently drafted, the TFT therefore do not consider that the JCS is sound with regard to its assertion that delivery of growth is dependent on the implementation of the NDR. There are alternative strategies that have been highlighted by the TFT and other landowners that will enable the delivery of growth in advance of the NDR, which if recognised by the JCS, would make the strategy effective and justified and, therefore, sound.

**Question B8:** *Paragraphs 44-48 of the Concept Statement at Appendix 5 (Focussed Change FC10) confirm that there can be no commitment to large-scale development in the growth triangle but assess that some 2200 dwellings (which appear to represent existing permissions and allocations [?] – see para 47) may be acceptably developed subject to 'interim improvements for other modes' and 'knowledge that the Postwick Hub improvement will be delivered and the NDR is committed'. In addition, it is suggested that a further 1000 dwellings may be built at the Eco-town. [By reference to the annual build figures for the various growth locations on p111 of the JCS, this means that the eco-town could progress to the stage expected of it by mid 2014-15 and the rest of the growth area to the stage expected of it by as late as mid 2021/22.] Question - Are these 'sound' limits/expectations, or should growth be more or less constrained in the absence of firm commitment to/funding of a start to the NDR?*

20. As we have highlighted earlier, in their responses to Matter 3b, the GNPD states that the NDR itself is not the primary means of providing access to the Growth Triangle and that the Growth Triangle will build on the existing transport linkages to the city centre and local services and employment areas. However, the GNPD states that there are existing

problems of congestion, delay and vehicles using unsuitable routes that will be resolved by the NDR.

21. As set out in responses to question B4 above, the TFT and other landowners have identified an inner link road to connect Salhouse Road and Plumstead Road which will enable the delivery of some growth in the north east sector in advance of the NDR. The TFT land also has direct access from the Plumstead Road and other side roads. The TFT have been involved in a number of master planning exercises and have recently held a Charette which identified that circa 700-800 new homes can be accommodated on TFT's land alone in advance of the NDR. As such, it is considered that the limits/expectations of growth should not be constrained as suggested by the GNDP in the absence of a firm commitment to/funding of a start to the NDR when there are reasonable and viable alternatives that will enable the delivery of new homes and jobs in advance of the delivery of the NDR.

**Question B9:** *What are the other critical infrastructure dependencies of the eco-town and the other component parts of the triangle? Are these parts divisible/indivisible in terms of these dependencies?*

22. 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 questions B4, B7 and B9 above. In terms of the other dependencies identified the GNDP this is water supply, sewerage capacity and electricity supply. In the revised Appendix 7 of the JCS, 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.

Other issue

**Question B10:** *If the JCS is unsound in relation to the growth triangle, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]*

23. The TFT support the identification of north east Norwich as the most sustainable location of growth. However, the TFT consider that the status of the Growth Triangle should be as a strategic allocation in accordance with PPS12 and that further detailed principles and guidance should be developed through the preparation of an AAP in collaboration with relevant stakeholders. The preparation of the AAP should not delay the delivery of growth and a streamlined approach to its preparation should be taken. The AAP will support the strategic allocation in the core strategy, which will provide developers and land owners with the requisite certainty and comfort to bring sites forward to deliver new homes and jobs.

24.

25. As currently drafted, the TFT do not consider that the JCS is sound with regard to its assertion that delivery of growth is dependent on the implementation of the NDR. The delivery of the NDR is uncertain which in turn would threaten the delivery of the JCS and much needed homes and jobs in the absence of any contingencies or reasonable alternatives which is contrary to PPS12. However, the GNDP state in their Matter 3b paper that the NDR in itself is not the primary means of providing access to the Growth Triangle and that it will build on the existing transport linkages to the city centre and local services. 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, which if recognised by the JCS, would make the strategy effective and justified and, therefore, sound.

26.

27. The TFT and other landowners in the north east sector have highlighted a reasonable alternative in the form of a link road that will enable the delivery of some growth in the north east sector in advance of the NDR. Through undertaken a master planning exercise in the form of a Charette, the TFT have identified that circa 700-800 new homes can be delivered on TFT land alone. However, this strategy is not recognised or considered in the JCS. As such, the JCS needs to recognise the inner link road (or other routes) as a viable and reasonable alternative strategy that can come forward in advance of the NDR, which would, in turn, result in a flexible, deliverable, effective and justified Core Strategy in this regard.