

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 C – Other Major Growth Locations in Policy 10

Wymondham

A *Does the JCS make clear, justified & effective growth proposals for the town?*

1. We broadly support the JCS proposals for development in Wymondham. However, as we have highlighted in our statement for Matter 3A, we believe both that there is capacity for additional development to be located in Wymondham, and that this would represent a more sustainable spatial strategy.
2. If additional development were to be allocated to Wymondham, this would increase the flexibility of the JCS, and improve the likelihood that it will be able to deliver development in the way in which it anticipates. While development at Long Stratton, and in the Growth Triangle, is predicated upon the delivery of major infrastructure, for which the funding sources and timescale are uncertain, this is not the case for Wymondham. Additional development at Wymondham can therefore ensure that a reasonable quantity of development is delivered consistently throughout the plan process.
3. As set out in our submission on Matter A3, the Core Strategy would be clearer if the diagram showing Main Housing Allocations on page 60 referenced the quantum of development at Wymondham as a minimum (as with other strategic locations), to tie in with the policy text.
4. We also note that there is a lack of clarity in the Plan regarding the implications of the 1800 units forming the South Norfolk 'non-strategic/smaller sites' element of the housing strategy. In practice, Policies 14 and 15 provide that around 100-200 dwellings will be allocated to Poringland (the only Key Service Village in South Norfolk not otherwise forming a strategic growth location), and a further 10-20 dwellings will be allocated to each of the 10 service villages in South Norfolk, providing a total of between 200-400 dwellings in the rural area. Policy 9 requires the remaining 1,400 to 1,600 dwellings from this 'pot' to be distributed "in accordance with the settlement hierarchy and local environmental and servicing considerations."
5. In practice therefore, the vast majority of the 1800 additional allowance for South Norfolk would necessarily be distributed to the Norwich fringe, Wymondham, and the other growth locations within South Norfolk, with the total for each location presumably to be specified by subsequent DPDs.

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6. It would be helpful in the interests of clarity for the Core Strategy to make clear that in fact the majority of the South Norfolk 'non-strategic/smaller sites' allowance will be in the form of additions to the strategic growth locations, and for the references to the individual growth locations (Wymondham and others) to cross-refer to this additional allowance in the supporting text to the relevant policy. We have made suggestions for the way in which amendments could be made to the relevant policies in our representations on Matter 10.

B *What are Wymondham's critical infrastructure dependencies and can growth there take place within the timescale set out on p111 of the JCS?*

7. The existing capacity of the critical infrastructure serving Wymondham would allow development to commence immediately, and provide time and advance funding with which to carry out any necessary infrastructure upgrades. There is also potential for shared infrastructure with other areas, which would make savings overall, and make efficient use of scarce resources.
8. An example of this is the required upgrade to the Thickthorn junction on the A11 / A47. This will serve the proposed development at Wymondham and the rest of the A11 corridor at Hethersett and Cringleford, and at Easton and Costessey. The JCS currently proposes a minimum 5,400 dwellings in these settlements, with the ultimate number likely to be somewhat higher due to the 'non-strategic/smaller sites' allocations. The junction is currently understood to have existing capacity to accommodate a reasonable quantum of development in the early part of the plan period, particularly if accompanied by an enhanced bus service. This development in the early part of the plan period can provide advance funding for this and other necessary infrastructure upgrades.
9. It should also be noted that the preferred solution, and ultimate cost, of any upgrade to the Thickthorn junction has not yet been determined, and the two options identified vary in price between £150,000 and £40 million¹. It is therefore not certain that the necessary improvements will be as high as the upper cost listed in appendix 7 of the JCS, and our recent conversations with the Highways Agency have suggested the cost may be somewhat lower.
10. The Water Cycle Study Stage 2b (Document ENV4.4) notes that the Wymondham Waste Water treatment Works (WwTW) also has capacity for 4,400 dwellings to be built under its existing consents. This WwTW serves Wymondham and its immediate rural area (a further total of 148 dwellings at Hingham are estimated for this area). The other settlements to the west of Norwich, namely Hethersett, Cringleford, Easton and Costessey, are to be served by connections to the Whitlingham WwTW. The Wymondham WwTW therefore provides capacity for double the current minimum JCS allocation for Wymondham.
11. Wymondham also already benefits from high quality public transport connections, which can help new developments early in the plan period to

¹ See Document T2, *Southern Bypass Capacity Assessment Report* (Norfolk County Council & Mott MacDonald, November 2008)

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achieve a better degree of modal shift towards public transport than can be achieved in other parts of the NPA. It already benefits from regular train services to Norwich and Cambridge, and bus services to Norwich and the surrounding area. It is also the only settlement of a significant size in the NPA, other than Norwich itself, to have a railway station.

12. Wymondham is also already the most self-contained of the settlements within the NPA, outside Norwich. It has a thriving town centre, with a range of facilities and a local market, and it is also served by local supermarkets. There are a number of potential development sites within a short distance of the centre of the town which could contribute to sustainable development from the beginning of the plan period.

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

13. We believe that the JCS is sound in its proposals for Wymondham. We support the flexibility inherent in the strategy, which will allow more than the minimum 2,200 dwellings to be constructed through additional allocations from the South Norfolk 'non-strategic/smaller sites' pot.
14. Similarly, we support the wording in Policy 10 that requires development at Wymondham to be delivered on 'a number of sites'. We believe that development is likely to be delivered more swiftly, and at a more consistent rate, if it is provided on a number of sites, promoted by a number of interested parties. This will preclude the possibility of land banking and the slow release of housing to artificially increase prices - a number of sites will increase competition, and should be of benefit to the local market in terms of the range and amount of new housing available.
15. However, we also believe that the JCS should provide explicitly for additional development at Wymondham, in lieu of development at Long Stratton. As noted in our response to Matter 3A, the Sustainability Appraisal process has already assessed a greater amount of housing at Wymondham, with 'Option 1' at the Regulation 25 Technical Consultation stage considering 4,000 dwellings at Wymondham, and a total of 8,000 dwellings on the A11 corridor. This SA, and the later Pre-Submission SA which returned to an examination of this option, concluded that it would be preferable to the 'preferred option' in sustainability terms. Further, our comments above in response to Matter 3C/B demonstrate that there is currently capacity for additional development to be accommodated at Wymondham.
16. The JCS currently allocates an unspecified amount of development to Wymondham of 'at least 2,200 dwellings', with the eventual allocation likely to be somewhat more due to the contribution to be made from the South Norfolk 'non-strategic/smaller sites' allocation. This strategy has been subject to SA and public consultation. Similarly, the public have been notified of the

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proposed 'Option 1' outlined above² and this Option has also been referred to in subsequent public consultation documents. We therefore suggest that both the Option 1 proposals, and the principle of a flexible strategy which will allow development to be allocated by subsequent DPDs has been subject to public consultation and Sustainability Appraisal.

17. In the light of these conclusions, we outline our suggestions for the way in which the development currently proposed for Long Stratton could be redistributed by the JCS to Wymondham, or to the A11 corridor, in our response to Matter 3C/P below.

Public Transport in the A11 Corridor

K Can these growth locations effectively support objective 7 on p27 of the JCS? Is there a clear and convincing strategy to ensure that adequate bus provision will be made in line with housing growth at a stage sufficiently early to influence travel patterns? What are the expected timetables and funding sources for achieving the NATS public transport proposals for the corridor and are these likely to be delivered?

18. We have noted in our response to Matter 3A1 that the evidence base suggests a Bus Rapid Transit (BRT) service could be provided to support development in the A11 corridor, particularly if the overall level of development is closer to 5,000 dwellings (rather than the minimum of 4,400). Given the likely contribution to be made to the total number of dwellings from the South Norfolk 'non-strategic/smaller sites' pot, the level of development in this area appears likely to reach this threshold within the plan period under the proposals in the JCS.
19. A BRT service would be expected to deliver a dedicated 'turn up and go' service with a bus every 10 minutes. This would be a high quality service, and could be designed flexibly so as to reach the maximum possible number of people in existing and new communities. We believe that this strategy is both clear and convincing, and that it offers the best possible chance of achieving a genuine modal shift away from car use in the new developments, as well as bringing a significant benefit to existing communities.
20. The JCS Transport Strategy Report 2010 (Document T4) notes that the timetable for delivering the NATS public transport proposals is closely related to the availability of funding. It appears that the timetable, and the available funding sources, will be clearer after the Government's Autumn Spending Review. However, it should be noted that development can take place in the A11 corridor immediately, and that this has the potential to contribute towards the delivery of any required infrastructure, such as the delivery of a BRT service.

² A letter was sent to every household in the JCS area to advise them of the Reg. 25 Technical Consultation, as noted in the GNDP's Soundness Self-Assessment (Document EIP95)

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21. It should also be noted that the early delivery of a BRT service will in itself create additional capacity on the A11 and its junctions, and may delay the need to carry out expensive upgrades; in this way, directing early funding to the BRT service could help both to improve the JCS' sustainability credentials, and aid its delivery.

Long Stratton

L Does the JCS make clear, justified and effective growth proposals for Long Stratton bearing in mind its poor assessed performance in sustainability appraisals undertaken since 2007?

22. The Sustainability Appraisal (SA) process has consistently judged the GNDP's 'preferred option' as being less suitable than 'Option 1', as considered at the Regulation 25 Technical Consultation stage, and under the Pre-Submission SA. The latter document is also clear in its advice that the growth proposals for Long Stratton are unsustainable, and detract from the overall sustainability of the JCS.
23. We have already noted in our response to Matter 3A1 that the GNDP's current retrospective justifications of the selection of this growth option is not supported by the available evidence base, or by clear evidence of local support. The proposals for development at Long Stratton have clearly been driven by the perceived need for a bypass, as stated by Policy 10 of the JCS.
24. The GNDP's response to the Inspectors' Question 3³, which outlines a 'Vision for Long Stratton' forms a more honest justification for the need for a bypass, focussing as it does on a desire to reduce local congestion and improve the environment within the village. However, the Sustainability Appraisal process has weighed these local considerations against the other more negative implications of a bypass, and has found the balance to be against these proposals.

M Is the town allocated more growth than suggested by its position as a 'key service centre' in the identified hierarchy of centres (see policies 14 and 19)?

25. The proposed development at Long Stratton is indeed contrary to the village's current capacity to accept new development. The proposals would double the size of this village, adding significantly to the number of new homes in an essentially unsustainable location, whilst at the same time not providing growth of anywhere near the scale necessary to create a self-contained settlement. As we have commented in our statement on Matter Matter 3A1, this would be a significant increase in size, and this level of development has not been justified by the evidence base, or by evidence of local support.

³ Appendix 6 of Document BP6

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N *In the light of the above comments, is the retention of the growth/bypass proposal sound? Is there convincing evidence to conclude that the required culture change from car-borne transport to more sustainable modes could be achieved? How would this be done? [The JCS is silent on this point.]*

26. We do not believe that there is any sound justification for the proposed bypass. We have noted in our response to Matter 3A2 that no source of funding has yet been identified for it, and that if it is to be delivered, this may be through developer contributions from elsewhere in the NPA, which itself appears contrary to the current CIL regulations. There is also no sound basis in terms of a sustainability appraisal, or public support for these proposals. Our response to Matter 3A1 notes that the evidence base suggests the bypass is likely to significantly increase car use, rather than lead to a modal shift away from it.

O *What are the critical infrastructure dependencies for this location and can its delivery take place within the timescale set out on p111 of the JCS?*

27. Development at Long Stratton is dependent on the provision of a bypass. Policy 7 of the Regulation 25 Technical Consultation⁴ proposed that growth should be limited to only 20 – 50 dwellings at Long Stratton in the event that a bypass would not be delivered, and implied that a bypass would be a pre-requisite for any further development at Long Stratton beyond this number. As noted above and in our response to Matter 3A2, no funding source has yet been identified for the Long Stratton bypass, and if it is to be funded, it is likely to draw this funding from other parts of the NPA, contrary to the CIL regulations.

28. Advance funding would also be required relatively soon for the design of the bypass, and to fund the necessary planning application. This process could reasonably take some years, and the Growth Locations trajectory in the JCS appears to imply that the bypass would be completed by 2018/19. It is therefore necessary to identify a funding source for the delivery of the bypass relatively early in the plan period, if it is to be delivered to the proposed timetable.

29. We also note in our response to Matter 3A2 that another critical item of infrastructure would be an upgrade to the Long Stratton Waste Water Treatment Works (WwTW). The Water Cycle Study Stage 2b (Document ENV4.4) notes that the WwTW currently has consent to provide for up to another 1,430 dwellings at Long Stratton. Beyond this, **'innovative solutions'** will be required in order to deliver the additional capacity. New capacity can only be delivered by Anglian Water, and this must be funded through their Asset Management Plan (AMP). The next AMP is for the 2015-20 period. Once funding has been secured, a solution can be designed and

⁴ Document STA4

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built, although this may take some time. Anglian Water have advised that the lead-in time for the construction of a new WwTW can take between 10-15 years⁵, and while upgrading an existing Works is not likely to take so long, it must be seen as a significant undertaking with a potentially lengthy timeframe.

30. If funding for this upgrade were only to be released towards the end of the AMP period in 2020, it appears doubtful that the upgrade could be designed and constructed in time to meet the apparent deadline implied by the JCS of 2024/25. This deadline assumes that the trajectory is correct in that 1,340 dwellings would have been constructed by April 2024. However, taking into consideration the likely effect of the South Norfolk 'non-strategic/smaller sites', as proposed under Policy 9, the total built in Long Stratton by this time could be higher. This implies that the upgrade to the WwTW could be required sooner, as the threshold of 1,430 dwellings would have already been reached. These uncertainties must be clarified through the JCS and the LIPP.

P If the JCS is unsound in relation to Long Stratton, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

31. In our response to Matter 3C/C above, we noted that the Sustainability Appraisal process has already considered a total of 4,000 dwellings in Wymondham, and another 4,000 on the A11 corridor, as part of 'Option1'. In addition, these proposals have been notified to the public and referred to in public consultation documents. We therefore believe that proposals for a level of development up to at least this level has already been subject to sustainability appraisal and public consultation.
32. We believe that the JCS could be amended to remove the proposed 1,800 dwellings from Long Stratton, and to add them to the Wymondham total. This would broadly accord with the Option 1 figure, which received a far more favourable response from the Sustainability appraisal process. Our response to Matter 3C/B above also outlines that Wymondham has the capacity to accommodate a significant amount of development immediately, and that this will provide the time and funding required to make any necessary improvements to critical infrastructure. Importantly, the WwTW at Wymondham also already has capacity to accommodate 4,400 dwellings.
33. However, should the Inspectors consider that they are unable to make such an allocation to Wymondham, we suggest that an alternative may be to add the Long Stratton total to the South Norfolk 'non-strategic/smaller sites' pot. As we have already noted, the majority of the 1,800 dwellings in this allowance would already be met via additions to strategic sites, since the scale of development in the rural areas is limited by Policies 14 and 15. Adding the Long Stratton element to the general South Norfolk 'non-strategic/smaller sites' allowance would keep the total number of homes for South Norfolk the same, but would allow greater flexibility in the subsequent

⁵ Gary Parsons of Anglian Water, quoted in the Water Cycle Study Stage 2b, paragraph 2.1.9
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distribution of that development, managed by the subsequent Site Allocations DPD and the Wymondham AAP, both of which would allow further opportunities for public consultation and Sustainability Appraisal.

- 34.** The GNDP's evidence strongly supports the need for the amount of housing proposed in the JCS to be delivered within the Plan period, to meet local housing need. In this context, we believe that the proposed options above are the most robust in the circumstances. However, should the Inspectors consider that they cannot support our suggested options, we believe that the only remaining option would be to delete the proposed allocation for Long Stratton without replacement, with the unfortunate consequence of reducing the overall scale of new housing set out in the JCS below the level needed and supported by the evidence base.

14 October 2010