



Matter 3C – Long Stratton  
Representor No. 8591

**JOINT CORE STRATEGY FOR BROADLAND,  
NORWICH AND SOUTH NORFOLK**

**EXAMINATION**

**MATTER 3C – LONG STRATTON**

**SUBMISSION ON BEHALF OF THE LEEDER  
FAMILY**

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## **APPENDICES**

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## 1. EFFECTIVE GROWTH PROPOSALS

### A Locally Distinctive Core Strategy

- 1.1 Paragraph 2.1 of PPS12 observes that spatial planning aims to produce a vision for the future of places that responds to local challenges/opportunities and is based upon a sense of local distinctiveness and community derived objectives. Paragraph 4.2 of PPS12 requires a vision to be informed by *“an analysis of the characteristics of the area and its constituent parts and the key issues and challenges facing them.”* The vision is expected to relate closely to any Sustainable Community Strategy for the area. Under the theme of a thriving economy, the South Norfolk SCS states that *“there remains a need to reduce congestion and air pollution and to conserve our environment. A Long Stratton bypass is a high priority to reduce the effects of traffic.”*
- 1.2 The spatial strategy for Greater Norwich reflects the approach regarding local distinctiveness and place shaping to be found in PPS12. Local distinctiveness is a factor that evolves as the LDF process unfolds. It starts with an understanding of an area’s issues and opportunities, identifying those which are of local importance (paragraph 4.33 of PPS12). The relevance and implications of those opportunities will inevitably vary from place to place. Drawing out these distinctions is important as this will influence the extent to which the final plan embodies the concepts of place shaping and local distinctiveness.
- 1.3 Through the process of identifying what is required in the specific local context, the LDF can achieve a change in a settlement’s fortunes as part of a wider policy framework which reflects local issues. Paragraph 9 of the PINS document ‘Examining Development Plan Documents: Learning from Experience’ states that *“the starting point for core strategies should be the identification of the critical issues that the council and its delivery partners are seeking to address.”* In identifying those critical issues, the document indicates that regard should be had to any SCS. The PINS guidance advises that *“the core strategy should focus relentlessly on the critical issues and the strategies to address them.”*
- 1.4 The South Norfolk SCS states that *“a Long Stratton bypass is a high priority to reduce the effects of traffic”*. The PINS document states that *“the whole point about a locally distinctive core strategy”* is that it seeks to address local critical issues. Since a core strategy is meant to focus relentlessly on critical issues, and the

provision of a bypass at Long Stratton is identified as an important matter requiring local action in the SCS for South Norfolk 2008-2018, it is appropriate for the Joint Core Strategy to provide a spatial planning response to the delivery of a bypass at Long Stratton, harnessing a growth dynamic focused upon Greater Norwich.

## 2. GROWTH AT LONG STRATTON

- 2.1 The JCS establishes local priorities to fashion the type of place reflective of all community aspirations. It determines what the emphasis should be in different parts of the Norwich Policy Area which is not homogenous in terms of economic or social geography. The JCS has evolved to provide a policy base whereby the level of growth can be harnessed to meet local objectives. The approach is to use growth in support of regeneration, recognising that different parts of the NPA have very different characteristics, functions and needs. Each settlement has its own role to play in delivering a coherent strategy which is capable of addressing and resolving local issues. The Joint Core Strategy gives South Norfolk Council the framework within which to deliver its place-shaping responsibilities.
- 2.2 PPS1 describes four elements to planning for sustainable development, including social cohesion/inclusion and protection/enhancement of the environment. It is not confined merely to the distance between settlements, a limiting perception that permeates through the JCS Sustainability Report (JCS 3). Paragraph 26 of PPS1 requires local planning authorities, when preparing development plans, to recognise the needs and broader interests of the community *“to secure a better quality of life for the community as a whole.”* Paragraph 27 of PPS1 refers to the promotion of urban and rural regeneration *“to improve the well being of communities, improve facilities, promote high quality and safe development and create new opportunities for the people living in those communities.”*
- 2.3 Paragraph 32 of PPS1 advises that the preparation of spatial plans should consider the needs and problems of the communities in an area and how they interact. Development plans should deal not only with what can be built *“where and in what circumstances, but should set out also how social, economic and environmental objectives will be achieved through plan policies.”* Policy 7 of the JCS expects new development to *“enhance the quality of life and the well being of communities.”*
- 2.4 Paragraph 5.4 of TP 8 notes that the level of services and facilities at Long Stratton *“is already high for a settlement of this size, making it closer in function to a market town than most villages.”* Furthermore, the employment base is *“considerably larger than would normally be expected”* in a settlement of this size. The removal of the deleterious through traffic will provide the opportunity to enhance the range of services available.

- 2.5 Whilst Long Stratton is included in Policy 14 as a Key Service Centre, paragraph 6.52 of the JCS states that “*stimulated by growth, commercial development may be sufficiently strong to begin to move the village towards Main Town status.*” The revitalisation and enhancement of Long Stratton can be achieved by implementing a locally distinctive core strategy.

### **3. HARNESSING GROWTH: REGENERATING LONG STRATTON**

- 3.1 One of the recommendations contained within the Joint Core Strategy Sustainability Appraisal Report (page 63) is that “*there is a need to develop a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton.*” The generation of such a vision should be based upon paragraphs 4.1 and 4.2 of PPS12 and the Sustainable Community Strategy for South Norfolk.

#### **The Sustainability Appraisal Report**

- 3.2 The approach to Long Stratton must be based in the area's key characteristics and the issues facing the settlement, addressing local distinctiveness. The Vision described at Appendix 6 of EiP 86 responds to the specific recommendation and the positive comments in the Appraisal Matrices to be found within the Sustainability Appraisal Report regarding Long Stratton. A robust and deliverable plan is one that reflects the needs of the local community. A fundamental principle underpinning place-shaping is the concept that every place should have an individual identity and function. Every place is different, with distinctive strengths and needs. The delivery of a bypass at Long Stratton in conjunction with new housing and employment growth will address a critical issue of fundamental importance to the local community.
- 3.3 PPS12 identifies the fact that spatial planning plays an essential role in the overall task of place-shaping and in the delivery of land, uses and associated activities. Spatial planning underpins the wider corporate strategy of councils and ensures that plans can be based on community aspirations. Page 72 of the Sustainability Appraisal Report deals with the impact of merely part of the wider sustainability appraisal of the policy base of the JCS, namely the perceived degree of separation between Norwich and Long Stratton.
- 3.4 The Sustainability Appraisal (JCS3) does not adequately reflect the existing level of public transport services between Norwich and Long Stratton, leading to an inappropriate conclusion. Long Stratton contains a significant range of local employment opportunities and social/community facilities. Table 2.1 of the Sustainability Appraisal Report includes all the SA objectives and sub-objectives, many of which have a positive bearing upon the growth agenda for Long Stratton. Unfortunately, those positive attributes are submerged by the hyperbolic comments in the Summary of appraisal findings.

- 3.5 An investigation of the Appraisal Matrices at Annex III of the Sustainability Appraisal Report uncovers a number of positive elements that arise from the proposed growth at Long Stratton. For example, the Appraisal Matrices acknowledge that Long Stratton residents will benefit *“from the enhanced quality of life resulting from a bypass”* (page 83). Furthermore, access to and across the whole GNDP area is expected to be improved with the completion of the Norwich Northern Distributor Road and the Long Stratton bypass (page 83).
- 3.6 The Matrix dealing with Policy 9 of the JCS states under SA Objective SOC7 (page 141) *“there is little evidence to suggest that the strategic locations of growth promoted by this Policy will lead to significant effects in terms of this objective, other than promotion of a by-pass at Long-Stratton (which will address identified environmental quality issues in the village centre).”* Page 139 notes that *“environmental quality as a result of transport passing through the village has been identified as a problem, and this Policy seeks to address this through promoting development that will then be able to fund a by-pass.”*
- 3.7 The delivery of a bypass is a critical local issue addressed in the JCS, reflecting the guidance in the PINS document of September 2009 which states that a core strategy should focus *“relentlessly on the critical issues that relate to the way the area is intended to develop and the strategies to address the critical issues identified.”* Furthermore, the Matrices acknowledge that *“a good range of services, facilities and employment opportunities do exist in Long Stratton and this will be expanded as part of the growth strategy”* and *“there are two major employers located within Long Stratton, and there will be further ancillary employment development as part of the growth strategy”* (page 142).
- 3.8 TP 8 acknowledges that the provision of a bypass at Long Stratton *“is a priority”* and the range of shops, services and employment at Long Stratton *“could be further enhanced with the removal of much of the through traffic, particularly the high proportion of commercial vehicles.”* The Topic Paper notes that congestion in Long Stratton *“is likely to see it become the first air quality management zone in South Norfolk, which gives an indication of the potential health and environmental impacts of continued traffic through the village.”* This is a critical local issue addressed by the JCS



- 3.9 The emerging vision for Long Stratton is achievable and has been informed by an analysis of the characteristics of the settlement, its relationship with Norwich/public transport provision and the critical issues/challenges facing the local community. The vision also responds to a sense of local distinctiveness and community derived objectives, including the long-established need for a bypass. A new road cannot be funded through the public purse and will only arise in conjunction with further growth at Long Stratton.

### **Vision Statement for Long Stratton**

- 3.10 The vision for Long Stratton is that by 2026 a significant improvement will have been achieved in terms of the environmental quality of residents by the construction of a bypass. The town will be rejuvenated by the removal of through traffic and the central area regenerated to serve the new population base. The new housing, retail units and employment areas will be built to the highest design and energy efficiency standards and the historic character of the centre of the town will have been restored by the removal of through traffic and the harnessing of the growth agenda for the Greater Norwich area.
- 3.11 The removal of environmentally intrusive through traffic will enable Long Stratton to rediscover its sense of identity and potential. Investment will have secured further local employment opportunities, thereby providing jobs in close proximity to the new homes. The fundamental change in the function and character of the town will enable the regeneration of its central area to be undertaken in a manner which reflects the scope of the settlement itself and its significance as a focus for the surrounding rural hinterland. Within the expanded settlement, all services and facilities will be readily accessible by foot, bicycle and public transport.
- 3.12 The future reprofiling of Long Stratton will arise as a result of the integrated development approach established through the JCS which brings together social, economic and environmental objectives. There will be an improved level of public transport service between Long Stratton and Norwich, enhancing and extending the present standard of service. The town will become a focus for its rural hinterland, enabling a community hub to be created to enhance local retail and public transport service provision. The town will have secured its own locally distinctive character as part of the matrix of settlements displaying their own individual character in a Policy Area focused upon the primary centre of Norwich. In the period covered by

the JCS, Long Stratton will have rediscovered its own essential quality and will have harnessed the positive benefits of growth to achieve its potential.

## **4. INFRASTRUCTURE**

- 4.1 There were infrastructure related issues raised with respect to the identification of Long Stratton as a major growth location in the JCS. There was discussion related to the ability of the settlement to contribute successfully to modal shift from the private car, and discussion related to the critical dependency on the bypass which have been considered in matter 3A. In summary, it is considered that a bypass linked to development is more deliverable than the previously promoted scheme that was reliant wholly on public funding. Norfolk County Council (NCC) is supportive of this strategy and still committed to a bypass for Long Stratton. NCC expects that the bypass specification and scale will change to suit a scheme delivered by a single landowner/developer contiguous with the development master plan for 1800 dwellings at Long Stratton. The bypass is indicated within the LIPP as costing £20m, substantially less than the previous bypass which cost in the order of £35m.
- 4.2 Public transport is to be enhanced through the promotion of a Core Bus Route which in keeping with other growth areas is to be built on the foundation of a good existing public transport service that is shown to achieve good patronage and mode share for Norwich as the key employment destination. Similarly, the self containment exhibited within Long Stratton demonstrates a high use of walking and cycling for travel to work.
- 4.3 The final issue of infrastructure, related to wastewater treatment capacity, was raised in respect of the conclusions contained in the GNDP Stage 2b Water Cycle Study (WCS) [ENV 4.4a and 4.4b]; we comment on this below and at Appendix A.

### *Wastewater*

- 4.4 The WCS considers the anticipated consumption of water based on the demand from projected growth with due regard to the requirements for water efficiency. By definition a water cycle is linked in that consumption then follows through to wastewater generation and the resulting flows which require treatment. The treated effluent is then returned to surface waters and groundwater which act as the primary sources for water supply, where the cycle then starts again,

4.5 At the beginning of the water cycle, the water supply strategy considers four demand scenarios based on different water consumption profiles; the conclusion is presented at paragraph 10.2.13 which states that “All new houses within developments of less than 500 homes should be designed to have a water demand strategy in keeping with levels 3 & 4 in the Code for Sustainable Homes. For developments of greater than 500 homes, houses will be expected to have a demand in keeping with levels 5 & 6 in the Code for Sustainable Homes.” This is repeated at paragraph 4.3.2 within the Topic Paper on Environment [TP3] and is also given full policy support at submission JCS area-wide Policy 3 (CS3).

4.6 Whilst water supply and wastewater generation are inextricably linked, the wastewater calculations do not reflect the conclusions of the water supply strategy, the need for water efficiency and Policy CS3. This has led to a re-assessment of the wastewater calculations (refer to Appendix A for a full justification), the results of which are summarised below:

**Table 4.1 - Capacity Analysis and Sensitivity Testing**

Scenario	Description	2026 DWF as percentage of flow “headroom”	Maximum number of dwellings to current flow consent
1*	Do nothing – future demand remains as it is currently.	113	1,429 (shortfall of 448)
2	Anglian Water target for future usage / Building Regulations requirement from April 2010.	106	1,632 (shortfall of 245)
3	Code for Sustainable Homes Level 3 or 4.	100	1,865 (shortfall of 12)
4	Code for Sustainable Homes Level 5 or 6 / Policy CS3 for developments in excess of 500 units.	90	2,448 (spare capacity for a further 571 dwellings)

\*Single scenario assessed by GNDDP and reported in WCS.

- 4.7 Based on the above, the allocation for a strategic development of 1,800 units (note the WCS tested 1,850 units which was the growth in the 'favoured' option not the submission JCS) that is compliant with Policy CS3 will mean the full 1,877 dwellings, to include for existing commitments, at Long Stratton is likely to be delivered without exceeding the current volumetric discharge consent at the wastewater treatment works. Furthermore, it is also shown that a development where the majority of dwellings only reach Code Level 3 or 4 (in water supply terms) could similarly be delivered within the existing volumetric discharge consent. The policy requirement for high levels of water efficiency is justified within the GNDP's Response to EM Conclusion 5 [EIP89].
- 4.8 If the current consented volumetric discharge from the wastewater treatment works is not exceeded, as a result of the proposed growth, then the investment planned by Anglian Water within AMP5 (2010-2015) to improve water quality is such that the sanitary consent limits will be met in terms of the legislative requirements of the Water Framework Directive and Habitats Directive.

## APPENDIX A

## **NPA6 – Long Stratton: Wastewater**

**September 2010**

### ***Introduction***

- 1.1 This technical note has been prepared in response to questions raised on the topic of wastewater at the Joint Core Strategy (JCS) Exploratory Meeting (EM) of the 13<sup>th</sup> May 2010. This note makes reference to the GNDP Stage 2b Water Cycle Study (WCS) [ENV 4.4a and 4.4b] throughout which forms part of the evidence base to the Joint Core Strategy [JCS 1].
- 1.2 This note specifically focuses on the issue of wastewater treatment capacity at the Long Stratton Wastewater Treatment Works (LS WwTW) but the methodology and assessment can equally be applied to other WwTWs across the JCS area.

### ***The Water Cycle Study***

- 1.3 The water supply strategy considers four demand scenarios based on different water usages; the conclusion is presented at paragraph 10.2.13 which states that *“All new houses within developments of less than 500 homes should be designed to have a water demand strategy in keeping with levels 3 & 4 in the Code for Sustainable Homes. For developments of greater than 500 homes, houses will be expected to have a demand in keeping with levels 5 & 6 in the Code for Sustainable Homes.”* This is repeated at paragraph 4.3.2 within the Topic Paper on Environment [TP3]. This is also given full policy support at submission JCS area-wide Policy 3 (CS3).
- 1.4 Whilst water supply and wastewater generation are inextricably linked, the wastewater strategy calculations within the WCS do not reflect the four scenarios tested within the water supply section. Only two assessments have been undertaken, the “GNDP WCS” assessment and the “AWS” assessment. Both strategies report insufficient capacity at the LS WwTW to accommodate growth within the existing volumetric discharge consent. However the Anglian Water Services assessment is reported to state that there is sufficient capacity (at the WwTWs highlighted as having insufficient capacity) if reductions in water use and lower occupancy rates are considered.
- 1.5 The wastewater figures reported within the WCS predict that the current headroom within the volumetric discharge consent at the LS WwTW equates to a dwelling headroom of 1,429 units. The WCS, however, refers to the delivery of 1,927 units in this location from 2008 onwards comprising 77 granted permissions together with 1,850 units (growth in ‘favoured’ option, now 1,800 units in submission JCS giving 1,877 units overall). Whilst the WCS refers to a solution to the shortfall being a new discharge consent, it is stated that the constraints imposed by the various legislative requirements cannot be met, i.e. the Water Framework Directive (WFD) and Habitats Directive (HD). The WCS therefore suggests innovative

wastewater solutions being required such as reed bed wetlands or high specification package treatment plants. More recently the GNDP's Response to EM Conclusion 3 [EIP86] at paragraph 4.33 states that AW is confident that the *"more limited constraints affecting a small part of the growth at Long Stratton can be overcome"*.

- 1.6 Despite the reference to there being a wastewater treatment solution for the full growth at Long Stratton, there is still the issue that the wastewater calculations do not reflect the conclusions of the water supply strategy, the need for water efficiency and Policy CS3. This has led to the re-assessment of the wastewater calculations to correspond to the water supply sensitivity testing within the WCS (refer to Table 4-1 of the WCS Technical Report [ENV4.4a]). The full results of the re-assessment are attached to this note.
- 1.7 The results of the re-assessment show that the allocation for a strategic development of 1,800 units that is compliant with Policy CS3 will mean the full 1,877 units, to include for existing commitments, at Long Stratton is likely to be delivered without exceeding the current volumetric discharge consent at the WwTW. Furthermore, it is also shown that a development where the majority of dwellings only reach Code Level 3 or 4 (in water supply terms) could similarly be delivered within the existing volumetric discharge consent. The policy requirement for high levels of water efficiency is justified within the GNDP's Response to EM Conclusion 5 [EIP89].
- 1.8 If the current consented volumetric discharge from the LS WwTW is not exceeded, as a result of the proposed growth, then the investment planned by Anglian Water within AMP5 (2010-2015) to improve water quality is such that the sanitary consent limits will be met in terms of the legislative requirements of the WFD and HD.

### **Conclusion**

- 1.9 The wastewater section of the WCS appears overly conservative by effectively just considering one scenario rather than the four tested within the water supply section and the resulting conclusion. The wastewater calculations similarly do not consider Policy CS3 in terms of the aspirations for high levels of water efficiency appropriate for the region.
- 1.10 A capacity analysis and sensitivity testing in-line with the four water supply scenarios reveals that it is highly likely that the proposed growth can go-ahead at Long Stratton without resulting in the need for a new discharge consent at the WwTW. The volumetric increase in discharge arising from development, up to the maximum already consented, can be achieved without breaching water quality requirements.



## **Capacity Analysis and Sensitivity Testing**

<b>Long Stratton WwTW Capacity Analysis</b>				
<b>Parameters</b>	<b>Unit</b>			
DWF consent	m <sup>3</sup> /d		1,200	
2008 DWF from existing installations (measured)	m <sup>3</sup> /d		686	
2008 "Population Equivalent"	head		5,202	
2008 Headroom	m <sup>3</sup> /d		514	
<b>Scenario (1)</b> per capita consumption (AW current average for metered and unmetered customers less 5 l/h/day for outdoor usage]	l/h/d		137	
<b>Scenario (2)</b> per capita consumption (AW target for future water usage/Building Regs in force from April 2010)	l/h/d		120	
<b>Scenario (3)</b> per capita consumption (CSH Level 3 or 4)	l/h/d		105	
<b>Scenario (4)</b> per capita consumption (CSH Level 5 or 6)	l/h/d		80	
2031 Occupancy rate	head/home		2.10	
2008 Occupancy rate	head/home		2.30	
Infiltration	%		25	
<b>Scenarios from Water Cycle Study</b>	<b>Maximum Number of Dwellings to Consent Limit</b>	<b>Additional DWF</b>	<b>Future DWF</b>	<b>*2026 DWF as % of flow 'headroom'</b>
Scenario 1 (Current figures – do nothing – future demand remains as it is currently)	<b>1,429</b>	675	1,361	113
Scenario 2 (AW target figures / Building Regs requirement from April 2010)	<b>1,632</b>	591	1,277	106
Scenario 3 (CSH Level 3 or 4)	<b>1,865</b>	517	1,203	100
Scenario 4 (CSH Level 5 or 6)	<b>2,448</b>	374	1,080	90

\* column corresponds with the last column of Table 3-3 of the WCS Technical Report