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Hearing Statement: Matter 4

Hethersett Land Ltd [8570]

Agent ref: [390]

Hearing Statement

Greater Norwich Joint Core Strategy
Development Plan Document
Matter 4

BIDWELLS



Quality Assurance

Site name: Land at Hethersett, South Norfolk (SS39600009)

Client name: Hethersett Land Ltd

Type of report: Hearing Statement – Matter 4

Version: Final

Date: 7th October, 2010

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Signed

Date 7th October, 2010

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Signed

Date 7th October, 2010

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1 INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Bidwells on behalf of Hethersett Land Ltd. It relates to:
- Representations submitted by Bidwells, on behalf of Hethersett Land Ltd to the pre-submission version of the Greater Norwich Joint Core Strategy and the Statement of Focussed Changes in respect of **Policy 4 (Housing Delivery)**, **Policy 9(Strategy for growth in the NPA)**, **Policy 10 (Locations for major new or expanded communities in the NPA)**, and **Policy 14 (Key Service Centres)** (Respondent ID: **8570**); and
 - A **Statement of Common Ground** agreed between the GNDP and Hethersett Land Ltd covering Matters 2 and 3.
- 1.2 This Hearing Statement is intended to amplify the representations made by Bidwells at the pre-submission stage of the Joint Core Strategy's production and update those comments in light of the suggested Focussed Changes and publication of new evidence, including the Drivas Jonas Deloitte Affordable Housing Viability Study (July 2010) and the Local Investment Plan and Programme (September 2010).
- 1.3 Since the issues raised in the representations are relevant to Matters 2, 3, and 10, this statement (for Matter 4) should be read in conjunction with the accompanying statements for Matter 2, 3 and 10 and the agreed Statement of Common Ground between GNDP and Hethersett Land Ltd (Covering Matters 2 and 3).
- 1.4 For information, Hethersett Land Ltd is taking forward the promotion of the land at Hethersett on behalf of landowners in control of land to the north and south of Hethersett.
- 1.5 The location and extent of the land being promoted (approximately 315 hectares) is shown in Appendix A.
- 1.6 The Statement has been sub-divided under the questions posed by the Inspectors in their Matters & Key Questions for Examination at the Hearings document (20/08/10).

2 **MATTER 4 INFRASTRUCTURE DELIVERY THE JCS GENERALLY AND POLICY 20 & APPENDICES 7 & 8 IN PARTICULAR)**

A. Is the JCS effective in what it conveys about the infrastructure necessary for its successful implementation and when and by which agencies this will be delivered? Does the Implementation Framework at Appendix 7 adequately identify the fundamentally essential infrastructure times without which its major component elements (e.g. the major growth locations) cannot progress? Are all 80 items in Appendix 7 equally critical, or would some be more appropriately styled desirable or aspirational? If so, which?

B Do any infrastructure items represent 'showstoppers' which, if not completed by a certain date, would prevent implementation of particular key aspects of the JCS? Does the JCS appropriately identify them, and the consequences of their non-delivery?

C Is there evidence of agreement by providers that there is a reasonable prospect of the required infrastructure being completed by the critical dates?

D Is the JCS flexible? Does it indicate actions that may need to be triggered by contingencies, such as failure to achieve timely provision of necessary infrastructure?

E Are policy 20 and page 10 of the JCS clear and effective on the issue of implementation, including the role of GNDP as a delivery agency.

2.1 The Statement of Common Ground between the GNDP and Hethersett Land Ltd and Hearing Statement for Matter 3 includes the agreed position and main issues on Matter 3 (part C, sub section E) concerning critical infrastructure dependencies for Hethersett which is also relevant to Matter 4 on infrastructure delivery at this growth location.

2.2 The JCS, as supported by Draft Local Investment Plan and Programme (LIPP), and technical work commissioned by Hethersett Land Ltd identify the essential infrastructure items needed to support growth at Hethersett. In summary, the key infrastructure dependencies at Hethersett are:

- A11/A47 Thickthorn Junction;
- Bus priority measures with potential for BRT serving Wymondham and Norwich;
- Waste water;
- Water supply;
- School provision;
- Cycle and pedestrian routes to strategic employment locations and Norwich;

- Green infrastructure.
- 2.3 Hethersett Land Ltd agrees that there are suitable, viable and deliverable solutions to addressing the necessary infrastructure upgrades at Hethersett. These are currently in the process of being tested in order to underpin and support a planning application for strategic growth at Hethersett (1,100 homes) anticipated to be submitted in 2011 and include alternative and innovative responses to providing infrastructure.
- 2.4 To support the strategic infrastructure investigations undertaken on behalf of the GNDP, Hethersett Land Ltd have commissioned a significant amount of detailed technical work to demonstrate that 1,100 homes to the North/North East of Hethersett is deliverable. The key infrastructure issues are set out below:

Key Site Issues and Infrastructure Dependencies

Landscape Capacity

- 2.5 A Landscape Baseline Analysis Report of Hethersett has been undertaken. In summary, the analysis suggests housing and mixed use development should be focussed to the north and west of Hethersett. This confirms the conclusion of the GNDP's topic paper: Strategy to Accommodate Major Housing Growth in the NPA (Nov 2009) (section 5.3).

Transport and Accessibility

- 2.6 A comprehensive Trip Generation Analysis and Traffic Assessment has been undertaken and demonstrates that development of 1,100 homes can be accommodated on the local highway network.
- 2.7 The majority of vehicular trips will gain access to the wider highway network via the B1172 and its junctions with New Road and Colney Lane. To accommodate the traffic, the existing priority cross roads of Colney lane and the B1172 will require signalisation. There is sufficient highway land available to accommodate this upgrade.
- 2.8 Upgrades to the existing Thickthorn (A47) junction are necessary, which are the subject of discussions with the Thickthorn Forum.

Utilities

- 2.9 A Servicing Strategy Appraisal has been undertaken relating to the existing infrastructure and provision of potable water, gas, electricity, telecommunications and sewerage for the proposed development of land north/north east of Hethersett.

- 2.10 The appraisal concludes that developments of 1,100 is viable with regards to utility supply, although a phased approach to development may be required to ensure adequate foul drainage capacity.

Potable Water Supply

- 2.11 The key issue for water supply is the source of the water, given the potential changes to abstraction licenses in the GNDP area. Investigations are ongoing to address this issue. This issue aside, there is sufficient capacity in the existing water mains to accommodate growth of 1,100 dwellings at Hethersett, although localised reinforcement works are likely to be required.

Gas Supply

- 2.12 National Grid Gas has an existing 300mm high pressure main which crosses the eastern end of the development area, plus a 100mm spur to a high pressure/medium pressure governor station. There are extensive medium pressure and low pressure mains in the general area of development. It is envisaged that sufficient capacity exists in the upstream network to cater for the provision of connections to new developments of 1,100 dwellings.

Electricity Supply

- 2.13 EDF has provided records showing their equipment in the vicinity of the development. The development is likely to compromise up to three 11KV overhead line ring circuits and therefore diversion of these circuits would seem necessary.
- 2.14 EDF has verbally indicated that they do not have capacity within the local 11Kv network to provide connections to the proposed development. For 1,100 dwellings it is likely that the load would need to be served from new substations served from the existing 11Kv network.
- 2.15 National Grid has an existing 400Kv overhead line crossing the site.

Government Pipelines and Storage Systems

- 2.16 There is an active pipeline crossing the development site that is operated by Government Pipelines and Storage Systems. GPSS wayleaves are generally 6.0m wide, extending 3.0m either side of the pipeline. It is possible that this pipeline could be declared redundant and the wayleave terminated as it is not currently being used, however further liaison with pipeline operators would be necessary. In the meantime, the pipeline and wayleave have been incorporated into the Emerging Draft Masterplan

Surface Water Drainage Strategy

- 2.17 The Greater Norwich Water Cycle Study generally states there are no significant flood risk issues for Hethersett. The Environment Agency Indicative Flood Maps show no significant

fluvial or tidal flood risks in the area, although an unnamed minor watercourse to the north-west of the site is shown as being at risk of flooding. The potential impact of the site on watercourses will be considered prior to any development in order to minimise the risk of flooding in the locality.

- 2.18 The Strategic Flood Risk Assessment for the Greater Norwich area suggests a number of SUDS components which may be suitable for this site, such as filter strips, swales, infiltration devices (depending on depth to water table), pervious surfaces, green roofs, water butts, ponds/wetlands and detention basins.

Foul Water Drainage Strategy

- 2.19 There is sufficient capacity at Whitlingham Sewage Treatment Works to accommodate a development of 1,100 units at Hethersett. However, technological modifications to Whitlingham Sewage Treatment Works will be required to limit phosphate discharge into the River Yare.
- 2.20 Anglian Water's Pre Development Enquiry report states that there is insufficient capacity available in the existing foul network at Hethersett to accommodate flows for a development of significant number of dwellings. Options to resolve this issue are currently being discussed with Anglian Water.

Renewable Energy

- 2.21 An Outline Renewable Energy Appraisal has been undertaken to ascertain an appropriate renewable energy strategy for development at Hethersett.
- 2.22 The appraisal has considered the impact of energy efficiency measures required to achieve Code for Sustainable Homes Level 3, 4 and beyond through the use of measures such as increased insulation, passive solar gain and energy efficient appliances.
- 2.23 The assessment concluded that it is unlikely that a single renewable energy technology will fulfil the requirements of the proposed development at Hethersett.
- 2.24 For the development of 1,100 dwellings, the policy requirements are likely to be met with 'bolt-on' renewables such as solar hot water, photovoltaics and ground source heat pumps.

Archaeology

- 2.25 Archaeological Assessment has been undertaken by NPS. The assessment considers the archaeological potential and historical significance of an expanse of predominantly arable land surrounding the village of Hethersett.

- 2.26 The evidence suggests that this wider area is one of reasonably high archaeological potential, having clearly been occupied and utilised throughout most periods, although archaeological potential within the proposed development area is more limited.
- 2.27 A possible Early Saxon cemetery is identified within the proposed development area and this has been incorporated in to the Emerging Masterplan. Further investigations will be undertaken to support the submission of the planning application.

Ecology

- 2.28 Ecological Assessment has been undertaken. The Ecologists Report that whilst there is potential for the presence of great crested newts in the general area, populations in the area are sparse. There is no evidence yet of water voles, otters or reptiles. The specialist botanical survey as reported only unremarkable findings.

Education

- 2.29 The Norfolk County Council Education Department have confirmed there are deliverable options for accommodating additional secondary school places.

Hethersett Land Ltd comments on the Local Investment Plan and Programme (LIPP)

- 2.30 Hethersett Land Ltd, welcome the publication of the (draft) GNDP Local Investment Plan and Programme (LIPP) (September 2010). The LIPP is acknowledged as a tool to help demonstrate the overall deliverability of the JCS in infrastructure terms and identify priorities for investment. It also accepted as relevant to support the formulation of a CIL/tariff, alongside other viability testing tools.
- 2.31 Hethersett Land Ltd main comments are concerned with the delivery section and main themes (section 7-10) and the Spatial Package for the South West (section 13). Hethersett Land Ltd acknowledges that the document is yet to be completed and is subject to further work on priorities etc.

Delivery

- 2.32 Hethersett Land Ltd accept the LIPP's assertion (section 6.1.1) conclusions that mainstream funding will continue to be the bedrock of infrastructure delivery; and that it is reasonable for those delivering growth in the GNDP area to also contribute to the delivery of infrastructure to support growth proposals.
- 2.33 Hethersett Land Ltd consider it essential that the CIL/Tariff is used to fund strategic infrastructure (such as the A47 southern bypass junctions, secondary schools etc), in order to reduce the impact on individual sites.

- 2.34 There will be a need to ensure fair and equitable collaboration over the management of spending and prioritisation of CIL/Tariff receipts. Importantly, the management mechanism has to be robust enough to withstand inevitable local pressures to spend (or not spend) receipts on certain infrastructure items in order to seek to delay delivery of much needed homes in politically sensitive locations. Most importantly, the level of development contribution set will need to demonstrate that it can be afforded, through viability appraisals etc.

Prioritisation

- 2.35 Hethersett Land Ltd considers that the JCS should be more explicit about the flexibility it has to allow growth in certain locations even where Priority 1 and 2 Infrastructure delivery does not go according to plan. For Instance, delays in the delivery of the NDR, need not result in a complete throttle on delivery throughout the GNDP area. Also, the GNDP may need to be more flexible about supporting growth proposals on the basis of short term, temporary and innovative solutions to infrastructure delivery.
- 2.36 Hethersett Land Ltd will comment on prioritisation of Housing Projects (section 6.5) when it is drafted. However, it is not anticipated that the LIPP will seek to prioritise certain growth locations over others, particularly in the Norwich Policy Area, given the area's acute overall housing shortage and unmet housing need.

Theme 1 – Green Infrastructure

- 2.37 Hethersett Land Ltd is engaged with the GNDP's Green Infrastructure Delivery Group, to ensure that development at Hethersett includes appropriate green infrastructure proposals that contribute to the overall Green Infrastructure Strategy for the Wymondham to Norwich Corridor and ensure overall strategic ambitions for Green Infrastructure are not prejudiced (section 7).

Theme 2 – Housing

- 2.38 Hethersett Land Ltd welcomes the commitment to encourage the early delivery of growth at the six large scale new communities, including Hethersett from 2011. In some instances, this will require Councils' to determine proposals on the basis of guidance and policies in the JCS, rather than to wait for site allocation documents, which may not be adopted until 2012 (para 8.1).
- 2.39 Hethersett Land Ltd understand the ambition to achieve as much affordable housing as possible, but is yet to be convinced that achieving the 40% affordable housing on sites is achievable without HCA investment (para 8.15).

Theme 3 jobs and the Economy

- 2.40 Hethersett Land Ltd supports the GNDP's focus for investment proposals for job and employment growth at Hethel, the NRP and the City Centre. All of these locations are within very close proximity to Hethersett and have strong potential to be accessed by means other than the private motor car.

Theme 4 Infrastructure

- 2.41 Hethersett Land Ltd supports the Norwich Area Transportation Strategy (NATS) as an essential tool for co-ordinating the delivery of transport infrastructure to support growth but suggests that it does not need to be implemented in its entirety to deliver growth at all locations.

Spatial Package – South West

- 2.42 Hethersett Land Ltd supports the GNDP's position of separating out Long Stratton from the south-west spatial package. Long Stratton is a separate entity, with its own issues to address and its delivery is not contingent upon infrastructure delivery in the south west sector (or vice-versa).
- 2.43 Hethersett Land Ltd is confident that it can deliver at least 1,100 homes at Hethersett and maintain a strategic gap to the north and south west.
- 2.44 Hethersett Land Ltd maintains that Hethersett represents a sustainable location for significant growth given its proximity to the NRP, Hethel and City Centre.
- 2.45 Hethersett Land Ltd is confident that it understands the infrastructure dependencies for the Hethersett Growth Area and is in active discussions with infrastructure providers to address infrastructure capacity deficiencies, using both proven and potentially innovative solutions.

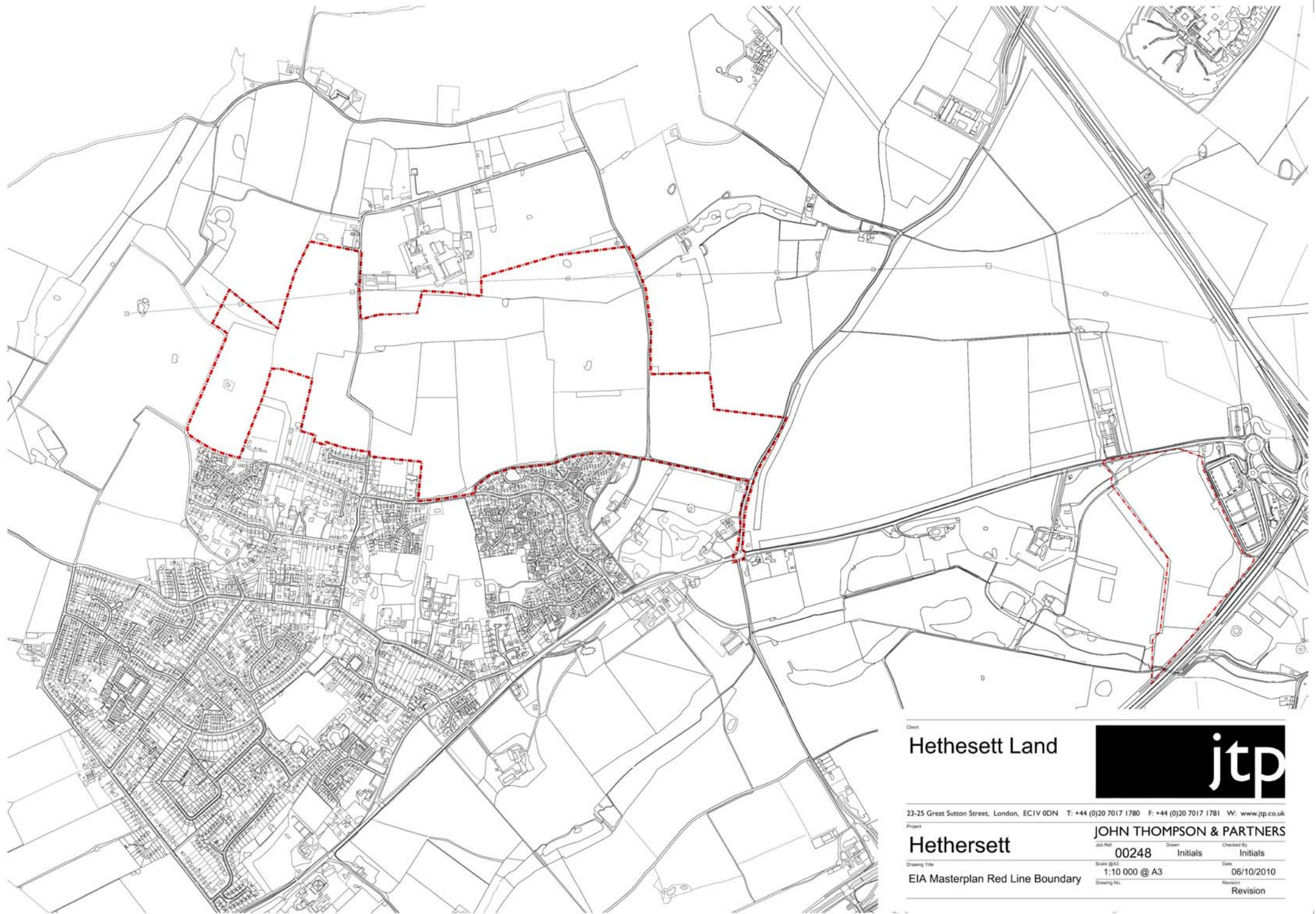
Conclusion

- 2.46 Hethersett Land Ltd can confirm that discussions about the possible solutions to specific infrastructure dependencies at Hethersett are ongoing and tested to ensure viability.
- 2.47 Hethersett Land Ltd acknowledge that the emerging CIL/Tariff approach of funding key infrastructure items (such as Trunk Road Junctions/Secondary School provision), rather than burden such costs on individual growth locations will help individual scheme viability.
- 2.48 Hethersett Land Ltd suggests that the mechanism for managing CIL/Tariff receipts and infrastructure delivery needs to be fair and robust to ensure equitability and timely delivery of growth at the various growth locations.

- 2.49 Hethersett Land Ltd welcomes the publication of the draft LIPP as a work in progress, and considers it will become a useful tool in helping to co-ordinate the delivery of the infrastructure needed to support the JCS's growth. Hethersett Land Ltd suggests that it should be seen as an iterative document, that will be updated when proposals are brought forward and infrastructure issues resolved etc.
- 2.50 Hethersett Land Ltd intends to submit a planning application for homes in 2011, demonstrating solutions to the infrastructure issues, with a view to begin to deliver residential units in 2012/13.

Appendix A

Plan Indicating Promoted Land



Client
Hethesett Land



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Project
Hethersett **JOHN THOMPSON & PARTNERS**

Job Ref	00248	Drawn	Initials	Checked By	Initials
Drawing Title	1:10 000 @ A3			Date	06/10/2010
EIA Masterplan Red Line Boundary	Revision No.			Revision	

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