

**GREATER NORWICH
DEVELOPMENT PARTNERSHIP**

**TECHNICAL CONSULTATION
FULL REPORT
(Final draft)**

Prepared for

Greater Norwich Development Partnership
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EXECUTIVE SUMMARY

Obviously, the evaluation of the comments on the GNDP Regulation 25 consultation is a matter for the Partnership. However, it may be helpful to draw out some common and recurring themes.

There are many expressions of concern about the effects of further development on key local infrastructure. These include (but are not exclusively) water and sewerage, health services, transportation/ roads, community facilities and infrastructure, education, policing and the environment (including impacts on SSSIs, nature reserves and green spaces).

Many respondents express views to the effect that local resources are at capacity or above, and that further development must bring with it benefits to support new populations, wherever housed. There are particular concerns in some rural communities, although some also welcome controlled development as a means of assuring or enhancing local services, and request a higher development “status” or the development of specific sites. Others are concerned about “knock on” effects on local infrastructure, including roads, local schools and so on.

This is coupled with concerns about sustainability, the desirability of “green infrastructure” and about ensuring that new development has the minimum carbon footprint. There are also suggestions about measures to improve the carbon footprint of existing developments, for example, through renewables technology.

Unsurprisingly, these concerns are balanced by suggestions from agents, landowners, developers and businesses suggesting the desirability of additional development, or the development of specific sites. There are also concerns about limitations on developments in some communities, the phasing/ timing of development, the effects of the economic climate, capacity for funding of some strategic improvements and the possible effects of CIL.

However, there are numerous suggestions regarding the sustainability of particular developments and how they could contribute to a more sustainable future. Several responses point to the potential for controlled development to benefit the economy of (particularly smaller) communities.

Major road improvements, such as the Long Stratton bypass and dualling of the A11, are mentioned several times as being highly desirable.

There are a number of highly specific suggestions about development sites which will have to be carefully evaluated, and which are outside the scope of this summary.

Listed below are the summaries for each of the 33 questions. The details of all representation relieved are included in the full report.



COMMENTARY ON INDIVIDUAL QUESTIONS

Q1. Have we identified the right critical infrastructure requirements?

There were 55 responses to this question. Nineteen agree the right requirements are identified, and a further eight agree with reservations or comments. Two are against.

Issues raised include health, climate change/ sustainability/ environment, water supply and waste management, the Long Stratton by-pass, transportation, the A11, A47 and A140, needs of smaller villages, junction improvements and Broadlands business park. Communities mentioned include Diss, Long Stratton, Wymondham, Hingham, Poringland, Framingham Earl, Norwich, Attleborough, Thetford, Bramerton, Costessey, Spixworth, Wroxham, Rackheath, Acle, Reepham, Loddon/Chedgrave and Wroxham, Mangreen, Swardeston, Mulbarton, Swainsthorpe, Kirby Cane, Bawburgh, Thorpe St Andrew, Little Plumstead, Hethersett and Little Melton.

Q2. CITY CENTRE - Are you aware of any major issues that would prevent delivery of this proposed policy?

There were 32 responses to this question. Five say there are no issues.

Issues raised include water supply and drainage, city centre development and traffic, SSSIs and nature reserves, policing, preserving the historic environment, transport infrastructure, scale of development and retail, leisure, office and culture uses in other growth locations, growth in Cringleford, traffic growth, regeneration, hospital capacity, objections from residents, the water cycle study, strategic flood risk, crime in Norwich City Centre, open space improvement, and Broadlands Business Park. Communities specifically mentioned include Norwich, Catton Grove Chalk Pit; Sweetbriar Road Marshes, St James Pit, Wensum Valley (Mile Cross & Sycamore Crescent); Mousehold Heath, Lion Wood, Wymondham, Cringleford, Colney. Cosstessey, Trowse, Poringland, Thurton, Loddon and Chedgrove, Sprowston, Rackheath, Norwich, Wroxham, Hethersett, Long Stratton, Stoke Holy Cross, Colney, and Costessey,



Q3. FOR OPTION 1 - What additional significant infrastructure requirements would there be?
There were 60 responses to this question.
Issues raised include sewerage, traffic, concentrating development in a new town, water and wastewater infrastructure, a new Parkway railway station, Strategic Waste Management Facilities, managing development of and links to existing infrastructure, A11 dualling and other road improvements, telephone/ broadband connections, environmental/ conservation issues, policing, railway links, new housing locations, strategic employment locations, the settlement hierarchy, development in Drayton, electrical supplies/ network, need for more detailed maps, classification of Tasburgh, maintaining Norwich's rural hinterland, satellite development at Long Stratton, development limits at Aylsham, scale of development at Colney Lane, street lighting, public transport, healthcare and leisure provision.
Communities mentioned specifically include Hethersett, Little Melton and Wymondham, Norwich, Mangreen, Thetford, Newmarket, Cambridge, Fiveways, Costessey, Easton, Sproston, Rackheath, Swardesdon, Mulbarton, Swainsthorpe Bowthorpe, Postwick, Cringleford, Colney, Taverham, Trowse, Hainford, Newton St Faith, Frettenham, Arminghall, Bixley CP, Framingham Pigot, Framingham Earl, Poringland, Drayton, Taverham, Horsford Manor, Longwater, Thickthorn, Tasburgh, Long Stratton, Thorpe End, Aylsham, Colney, Wroxham and Bawburgh.

Q4. FOR OPTION 1 - What are the constraints to delivery?
There were 37 responses to this question. One response says there are no significant constraints.
Issues include traffic and road infrastructure, site assembly and coordination, infrastructure costs, clarity of the settlement hierarchy, water availability and quality, environmental and conservation issues, police infrastructure, archaeological sites, coordination of services/infrastructure, the planning system, employment uses, site availability, identity of Hethersett, infrastructure timing, investment in public transport, water/drainage and healthcare. Communities mentioned include Elvedon, Wymondham, Longwater, Cringleford and Attleborough, various SSSIs / nature reserves, Easton, Colney, Harford Bridge, Hethersett, Rackheath, and Thorpe End.



Q5. FOR OPTION 1 - What opportunities does this option present?
There were 32 replies to this question.
Issues mentioned include a new sustainable community at Mangreen, sustainable transport infrastructure, environmental improvements, delivery of affordable homes and community facilities, a new business park, integration of sustainable homes and jobs, transport links, enhancing the strategic road network, use of park and ride, new green spaces / habitat, improved facilities and a cross-city development corridor. Communities mentioned include Mangreen, Rackheath, Easton, Norwich, Hethersett, Little Melton, Wymondham, Costessey, Thickthorn, and Attleborough.

Q6. FOR OPTION 1 - How will this link with your longer term investment strategies?
There were 21 responses to this question. One is completely opposed.
Issues raised include meeting sustainable growth objectives, development in Little Melton, expansion in the Rackheath area, investment in community facilities, policing, a strategic employment site at Norwich airport and habitat creation. Communities mentioned include Mangreen, Swardeston, Mulbarton, Swainthorpe, Norwich, Little Melton, Rackheath, Easton, Hethersett and Wymondham.

Q7. FOR OPTION 1 - Could your organisation commit to support it if it were selected?
There were 35 responses to this question. Fifteen say they could commit to support and five are opposed.
Issues mentioned include the Water Cycle Study, self-sufficient/ sustainable settlements, and conservation/ green infrastructure. Communities mentioned include Little Melton, Wymondham, Norwich, Mangreen, Swardeston, Mulbarton, Swainthorpe, Sprowston, Rackheath, Attleborough, Thetford, Dereham, Colney Lane and Cringleford.



Q8. FOR OPTION 2 - What additional significant infrastructure requirements would there be?
There were 37 responses to this question. One says there would be additional significant infrastructure.
Issues mentioned include water and wastewater infrastructure, strategic waste management facilities, links to existing infrastructure, new infrastructure, policing, timing of infrastructure, rail links/ infrastructure, cycle paths, high speed internet, more detailed maps, character of Wymondham, conservation/ green infrastructure, flood risk in Norwich city centre, rural hinterland of Norwich, roads and transport provision/ congestion (including A11/ A47/ A140), Long Stratton by-pass, healthcare and leisure facilities. Communities mentioned include Easton, Costessey, Sprowston, Rackheath, Swardeston, Mulbarton, Swainsthorpe, Bowthorpe Postwick, Trowse, Wymondham, Hethersett, Little Melton, Long Stratton, Norwich, Thurston, Loddon, Chedgrove and Hethel.

Q9. FOR OPTION 2 - What are the constraints to delivery?
There were 30 responses to this question. Two say there are no significant constraints.
Issues mentioned include Long Stratton bypass, timescales/ infrastructure timing, policing, archaeological sites, coordination of public sector organisations, finance, the planning system, infrastructure in Wymondham, Norwich city centre flood risk, identity of Hethersett, green infrastructure, public transport, traffic infrastructure and healthcare. Communities mentioned include Long Stratton, Rackheath, Easton, Norwich, Colney, Longwater, Harford Bridge, Wymondham, Hethersett, Thorpe End and Long Melton.

Q10. FOR OPTION 2 - What opportunities does this option present?
There were 31 responses to this question.
Issues mentioned include Long Stratton bypass, road infrastructure, sustainable transport infrastructure, homes and community facilities, cross working between public sector organisations, integrating home with jobs, community infrastructure, investment in South NPA, new green spaces, and a cross-city development corridor. Communities mentioned include Long Stratton, Rackheath, Easton, Norwich, Wymondham, Hethersett, Little Melton, Costessey and Thickthorn.



Q11. FOR OPTION 2 - How will this link with your longer term investment strategies?
There were 23 responses to this question. One response says it is completely opposed to its plans.
Issues raised include development in Little Melton, future growth, sustainable settlement, policing, development of educational facilities, flood defences and habitat creation. Communities mentioned include Little Melton, Rackheath, Easton, Norwich, Wymondham, Tasburgh, Long Stratton, Colney and Hethersett.

Q12. FOR OPTION 2 - Could your organisation commit to support it if it were selected?
There were 23 responses to this question. Eleven could commit to support it. Five could not.
Issues mentioned include employment, urbanisation of rural South Norfolk, rural roads, conservation, sustainability, housing provision, over development, and green infrastructure. Communities mentioned include East Carelton, Ketteringham, Mangreen, Little Melton, Wymondham, Swardeston, Mulbarton, Swainthorpe, Norwich, Sprowston, Rackheath, Hethersett and Cringleford.

Q13. FOR OPTION 3 - What additional significant infrastructure requirements would there be?
There were 41 responses to this question. One says there are no additional significant infrastructure requirements.
Issues mentioned include water and wastewater infrastructure, strategic waste management facilities, links to existing infrastructure, reduced opportunities for walking, cycling and public transport, policing, retail provision, coordination of public services, high-speed internet access, more detailed maps, loss of countryside, scale of development, drainage in Wymondham, green infrastructure, Norwich city centre flood risk, the rural hinterland of Norwich, traffic/ transport infrastructure and healthcare. Communities mentioned include Easton, Sprowston, Rackheath, Swardeston, Hethersett, Mulbarton, Swainthorpe, Bowthorpe, Mangreen, Harford Bridge, Norwich, Postwick, Trowse, Wymondham, Long Stratton, Costessey, and Hethel.



Q14. FOR OPTION 3 - What are the constraints to delivery?
There are 30 responses to this question.
Issues mentioned include funding of Long Stratton bypass, sustainable transport infrastructure, protecting and enhancing biodiversity, strain on infrastructure, cost, timescales/ timing, policing, archaeological sites, the planning system, coordination between agencies, jobs and employment provision, traffic/road infrastructure and healthcare. Communities mentioned include Long Stratton, Rackheath, Mangreen, Swardeston, Mulbarton, Swainsthorpe, Norwich, Colney, Longwater, Harford Bridge, Wymondham and Thorpe End.

Q15. FOR OPTION 3 - What opportunities does this option present?
There were 26 responses to this question.
Issues mentioned include Long Stratton bypass and traffic, sustainable transport infrastructure, retail floorspace, integration of new homes with jobs, community infrastructure, new green spaces/ landscape and public transport. Communities mentioned include Long Stratton, Rackheath Norwich, Wymondham and Blofield.

Q16. FOR OPTION 3 - How will this link with your longer term investment strategies?
There were 23 responses to this question.
Issues mentioned include growth and investment, sustainability, employment at Norwich Airport and wildlife habitat. Communities mentioned include Rackheath, Easton, Sprowston, Harford Bridge, Norwich, Wymondham, Tasburgh, and Colney..



Q17. FOR OPTION 3 - Could your organisation commit to support it if it were selected?
There were 33 responses to this question. Twelve say they could commit to support and seven say they could not.
Issues mentioned include protection of rural communities, infrastructure, land ownership, sustainability, retail provision and transportation. Communities mentioned include Mangreen, Swardeston, Mulbarton, Swainsthorpe, Wymondham, Easton, Sprowston, Rackheath, Norwich, Hethersett and Little Melton.

Q18 What additional significant infrastructure requirements would there be?
There were 26 responses to this question.
Issues mentioned include wastewater treatment in Aylsham and traffic in Diss, policing, retail floorspace, water supply, green links / infrastructure, renewable energy, NNDR/ junction improvements on A47, housing allocations, pressure on facilities in Harleston, healthcare, growth in Diss and public transport infrastructure. Communities mentioned include Aylsham, Diss, Harleston, Wymondham, Hethersett, Reepham, Wroxham, Norwich, Acle, Colney and Cringleford.

Q19 What opportunities can growth bring?
There were 19 responses to this question.
Issues mentioned include enhanced status for Diss, increased sustainability for Aylsham, the retail hierarchy, policing, town centre improvement, green infrastructure, increased sustainability, jobs/ employment, status of Long Stratton and increased early housing allocations. Communities mentioned include Diss, Harleston, Beccles, Aylsham, Wymondham and Long Stratton.



Q20 What are the constraints to delivering the proposed level of growth and how can these be overcome?
There were 15 responses to this question.
Issues mentioned include traffic flows, Aylsham STW capacity, the economic climate, SSSIs and nature reserves, archaeological sites, transportation, infrastructure and land availability. Communities mentioned include Aylsham, Harleston, Diss, and Wymondham.

Q21 How could growth in main towns link with your longer term investment strategies?
There were 14 responses to this question.
Issues mentioned include exclusion of Attleborough, providing a “critical mass” for future investment and retail, sustainability in Diss, a cross-city development corridor. Communities mentioned include Diss, Attleborough, Norwich, Ipswich, Bury St Edmunds, Lowestoft, Great Yarmouth, Costessey, Easton, Aylsham and Wymondham.

Q22 What additional significant infrastructure requirements would there be?
There were 30 responses to this question.
Issues mentioned include infrastructure, growth in Hingham, policing, a new inner link road, transportation/ road issues, capacity in Hethersett, housing in Poringland and Framlingham Earl, status of Wroxham and Hoveton, sewer networks, housing allocations, strategic growth, status of Berge Apton and capacity of Long Stratton. Communities mentioned include Hingham, Ditchingham, Aylsham, Diss, Harleston, Wymondham, Wroxham, Hoveton, Brundall, Loddon, Acle, Blofield, Brundall, Hethersett, Hingham, Loddon, Chedgrave, Long Stratton, Poringland, Framingham Earl, Reephams, Wroxham, Cringleford, Mulbarton, Poringland, Rackheath, Trowse, Salhouse, Spixworth, Alpington, Yelverton, and Berge Apton.



KEY SERVICE CENTRES -Q23 What opportunities can growth bring?
There were 25 responses to this question.
Issues mentioned include support for existing businesses and services, more employment, policing, the categorisation of Ditchingham, provision of infrastructure, relocation of Wroxham Football Club and trade for local businesses / benefits for local economies. Communities mentioned include Aylsham, Diss Harleston, Wymondham, Norwich, Watton, East Dereham, Hingham, Ditchingham, Wroxham, Hoveton, Brundall. Loddon, Hethersett, Blofield, Hethersett and Long Stratton

KEY SERVICE CENTRES - Q24 What are the constraints to delivering the proposed level of growth and how can these be overcome?
There were 25 responses to this question.
Issues mentioned include lack/ delay of infrastructure, developer contributions and development at Poringland and Framingham Earl, visitor pressure and water abstraction effects at SSSIs and reserves, archaeological sites, traffic pressures, non-delivery of facilities, tight settlement boundaries around Blofield, biodiversity, exception policies and 'community feel'. Communities mentioned include Hingham, Poringland, Framingham Earl, Acle, Brundall, Loddon, Chedgrave, Reepham. Wroxham. Hoveton, Hethersett Aylesham, Blofield and Long Stratton.

KEY SERVICE CENTRES - Q25 How could growth in key service centres link with your longer term investment strategies?
There were seven responses to this question.
Issues mentioned include benefits for the local economy, infrastructure and the A140 bypass. Communities mentioned include Blofield, Acle, Loddon, Chedgave, Reepham and Wroxham.



SERVICE VILLAGES - Q26 What additional significant requirements would there be?
There were 17 responses to this question.
Issues mentioned include wastewater / drainage treatment capacity, educational infrastructure, employment sites, benefits for residents, STW at Aylsham, new housing in service villages, improved transportation facilities, improved mobile phone coverage, high speed internet access, development of Reedham and dispersed traffic generation. Communities mentioned include South Walsham, Trowse, Rackheath, Aylsham, Reedham, Norwich, Cantley, Tasburgh, Brundall, Blofield, Great and Little Plumstead and Long Stratton.

SERVICE VILLAGES - Q27 What opportunities can growth bring?
There were 15 replies to this question.
Issues mentioned include support for the existing community, objection to creation of new towns/ settlements, consolidation of existing infrastructure and services, developments within Service Villages, status of some communities as Service Villages, scope for development, development of Reedham and risk of increased crime. Communities mentioned include South Walsham, Long Stratton, Trowse, Reedham, Barford, Harleston, Diss, Salhouse and Norwich.

SERVICE VILLAGES - Q28 What are the constraints to delivering the proposed level of growth and how can these be overcome?
There were 19 responses to this question.
Issues mentioned include impacts on environment / landscape / conservation, flood risk, traffic, infrastructure development, effects on SSSIs / reserves, categorisation of Ditchingham, archaeological sites, rural employment opportunities, status of Barford, conservation areas status of Salford, development in Trowse, site availability, improved services, development should be directed to Flood Zone 1, green infrastructure, exception policies and existing infrastructure. Communities mentioned include South Walsham, Trowse, Brooke, Ditchingham, Great Witchingham, Horsford, Newton Flotman, Reedham, Acle, Blofield, Brundall, Reepham, Wroxham, Barford, Salhouse, Tasburgh and Long Stratton.



SERVICE VILLAGES - Q29 How could growth in service villages link with your longer term investment strategies?
There were 13 responses to this question.
Issues mentioned include wastewater treatment capacity, sustainability of village school, integration with major growth locations, allowing development in the absence of major sites, status of Barnham Broom, status of Dickleborough, land availability, parish council income and status of Rackheath. Communities mentioned include Trowse, Barnham Broom, Dickleborough, Tasburgh, Diss, Salhouse, and Rackheath.

OTHER PLACES - Q30 Do you agree with the approach to development in other villages, the countryside and the Broads?
There were 42 responses to this question. Fourteen respondents agree, and eight object.
Issues mentioned include unsuitability of Wroxham as a service centre, inconsistency of approach to Little Melton, protection / expansion of community and village halls, employment uses, omission of Foulsham as a Service Village and inclusion as an Other Village, SSSIs and nature reserves, Easton's designation as an Other Village, supply of land in smaller rural villages, pressure on the Broads, status of Hempnall, status of Brampton, status of Barnham Broom, protection of the broads, CIL mechanism, exception policies, status of Kirby Cane, highway improvements/ traffic, status of Brampton, and status of Wortwell. Communities mentioned include Wroxham, Hoveton, Little Melton, Frettenham, Foulsham, Barnham Broom, Bressingham, Cantley, Ellingham/ Kirby Row, Gillingham, Woodton, Easton, Costessy, Salhouse, Hempnall, Brampton, Bramerton, Rackheath, Kirby Cane, Bawburgh, Thorpe St Andrew, Colney, Cringleford, Longwater, Wymondham, Elveden, Blofield, North Burlingham, Acle, Wortwell, Hethersett, Hainford, Waterloo, Great Plumstead and Wicklewood.



AREA WIDE POLICIES - Q31 Do you agree these policies will deliver the vision and objectives?
There were 48 replies to this question. Ten agree with the policies. One objects.
Issues mentioned include carbon emissions in Greater Norwich and the establishment of a Local Energy Company, tourism and leisure, development of small enterprises, jobs and essential services in rural communities, agreement of wide area policies with PPS12, archaeological sites, meeting future housing need, the location of future development, employment growth, Housing Corporation requirements, growth in villages other than Key Service Centres, green issues, status of Blofield, impact of Norwich Airport, “secured by design”, new cricket grounds, sustainable economic development, transport, timescales and need for a “health and wellbeing” strategy. Communities mentioned include Frettenham, Norwich, Thorpe Marriot, Bowthorpe, Costessey, Longwater, Loddon, Drayton, Acle, Blofield, Brundall, Reepham, Wroxham, Reedham, Thorpe St Andrew, Cringleford, Colney, Long Stratton and Wymondham..

Q32 Do you support our approach to funding infrastructure and promoting quality in new developments?
There were 33 replies to this question. Ten say they support the approach and two object.
Issues mentioned include provision of strategic infrastructure, apparent exclusion of cultural assets/ facilities, reduction of carbon footprint, investment in local infrastructure, policing, CIL, proportion of affordable housing, the coordination of various agencies, visitor pressures, green infrastructure, representation for health bodies and sports facilities. Communities mentioned include Easton, Norwich, Harford Bridge, Kirby Cane, Wymondham, Bawnurgh and Long Stratton.



Anything Else?
There are 58 replies in this section. Two are anonymous and do not address the consultation.
Many of the replies in this section are complex, and do not permit of ready summary, however included are proposals for specific sites, the extent of development, green issues, infrastructure, eco-towns, sustainability, coordination of growth in the A11 corridor, the economic climate, Gypsies and Travellers, Norwich Airport, and rail freight opportunities. Communities mentioned include Marsham, Hethersett, Wymondham, Little Melton, Great Moulton, Aslacton, Acle, Aylsham, South Walsham, Diss, Thorpe End, Stoke Holy Cross, Drayton, Frettenham, Diss, Norwich, Long Stratton, Wroxham, Mangreen, Sprowston, Rackheath, Felthorpe, Salhouse, Harleston, Reepham, Trowse, Loddon, Norwich, Attleborough, Snetterton, Thetford, Coltishall, Mousehold Heath, Cringleford, Little Plumstead, Long Melton, Trowse and Brandon.



INDIVIDUAL QUESTION DETAIL

Q1. Have we identified the right critical infrastructure requirements?		
	There were 55 responses to this question. Nineteen agree the right requirements are identified, and a further eight agree with reservations or comments. Two are against.	
	Key issues raised include health, climate change/ sustainability/ environment, water supply and waste management, the Long Stratton by-pass, transportation, the A11, A47 and A140, needs of smaller villages, junction improvements and Broadlands business park. Communities mentioned include Diss, Long Stratton, Wymondham, Hingham, Poringland, Framingham Earl, Norwich, Attleborough, Thetford, Bramerton, Costessey, Spixworth, Wroxham, Rackheath, Acle, Reepham, Loddon/Chedgrave and Wroxham, Mangreen, Swardeston, Mulbarton, Swainsthorpe, Kirby Cane. Bawburgh, Thorpe St Andrew, Little Plumstead, Hethersett and Little Melton.	
6838	<p>The Parish Fields Practice I am writing on behalf of the Partners of the Parish Fields Practice, one of the two GP Practices located in Diss. As you will be aware, Diss has been growing steadily over the past 30 years, with the two Practice's patient population growing at around 200 patients per annum. However, this has not and is not always been supported by a growth of infrastructure.</p> <p>The two practices and the community health centre based in Mount Street are currently awaiting an extension and development programme that will allow services to be delivered in a more appropriate environment. Whilst this development has received planning permission, it is currently on hold due to constraints at NHS Norfolk, however it is hoped that this will go ahead with completion by around 2010 to 2011, thus allowing better services to the growing populations.</p> <p>There are concerns about the levels of growth within Diss, particularly in the provision of social housing and the impact that this has when additional resources are not provided. Diss currently has the second highest number of underage pregnancies in South Norfolk and has an increasing number of patients who are dependant on drugs and alcohol, It is essential that social resources are allocated in order that these types of issues can be addressed. The Diss Practices are currently working as part of the South Norfolk health Improvement Partnership (SNhIP). This group works on Practice Based Commissioning of health services and is developing links with South Norfolk Council in order that joint health objectives can be established. This may be one forum that can help shape the infrastructure requirements for the joint core strategy.</p>	
6839	Anglian Water Services Ltd Yes	



6904	<p>Greenhouse Environment/ Co-op Learning Network Under para 4.2, bullet 1, you claim that "The Norwich area has a strong track record in planning and developing projects which champion environmental sustainability". While we would agree that there are examples of world-class new developments such as some of the recent buildings at the UEA, we also believe that there has been a tendency for many years to be more effective at making green claims for council planning policy which have not necessarily been reflected in action.</p> <p>For example, public buildings such as the Forum which could have been flag-ships for low-carbon design have actually been a huge missed opportunity constructed as they were with the highest embodied carbon materials possible and without any renewable generating capacity built-in. In contrast, attempts to retrofit renewables technology to existing buildings (which account for the bulk of emissions associated with the built environment) have in fact in the past been resisted by City Hall and only approved against the advice of planning officers (e.g. solar tubes on our Grade 2* building). Therefore, we suspect that claims such as those made in your document are likely to ring somewhat hollow with any readers with knowledge of the issues.</p>	
6919	<p>Norfolk Environmental Waste Services On 5th February 2008 NEWS/SRM submitted a representation on the Issues and Options Consultation for the Broadland, Norwich and South Norfolk Joint Core Strategy. An essential consideration for the Core Strategy set out within the original representation is the protection of strategic waste management facilities from the encroachment of other incompatible development that might threaten the function of those facilities. As this issue does not appear to have been picked up in this [Regulation 25 technical] consultation document we would like to take the opportunity to resubmit the content of that representation again for its consideration.</p> <p>The NEWS/SRM Issues and Options Representation is attached with this form. Please accept it as a formal response to this consultation.</p>	
6927	<p>Thos. Wm. Gaze & Son Yes, although a Long Stratton bypass should be considered 'Critical' not 'Essential Supporting'. A lack of EERA/SoS for Transport funding before 2016 should not downgrade its regional importance as one of only two arterial routes to/from the GNDP policy area.</p>	
6944	<p>Woods Hardwick Planning Yes, the NNDR is important to serve the locations of growth together with the improvements to the A47 as well as substantial infrastructure investment.</p>	



6966	<p>Andrew Pym Chartered Surveyor There is no opportunity to comment on the Spatial Vision in Chapter 5 so this is addressed here to set the remaining responses in context.</p> <p>The last line of the first paragraph in the box in 5.4 says that "people will have good access to good quality jobs and essential services". That is certainly true in the main centres and for those who will live in the proposed new large development sites. It is not true for the many people who live in rural settlements categorised below the level of market town and the Strategy does nothing to address this. There is a clear opportunity to improve the services and accessibility of many communities by spreading development around and taking benefit for both the new and the existing residents in terms of sustaining and improving facilities in the village, improving opportunities for public transport and achieving carbon savings for both the new and existing homes and people. The focus on large developments close to the largest settlement of Norwich means that the opportunities to address the sustainability of other settlements is missed.</p> <p>The section on Communities, Deprivation and Regeneration identifies the benefits of improving transport to and from the countryside allowing "everyone [to] take part in community and cultural activities". It is difficult to see how this will be achieved in the life of the Strategy if the benefits are not to be achieved from development in rural communities. Similarly, in the section on Living, Working and Getting Around, it is said that "rural isolation will be reduced by improving transport networks ..." and again it is impossible to see how this will be achieved within a Strategy which focusses on the concentration of development and facilities within close reach of Norwich and a few other main centres.</p> <p>The opportunity to improve sustainability for existing people and properties is not addressed in the section on Service Villages and Other Villages. This needs to form a part of the Strategy.</p> <p>Instead, all of the Objectives focus on the integration of new development with new jobs and new services to create a more sustainable pattern of living for those areas identified for major development. The greater contribution to carbon wastage and the present unsustainability of much of the Strategy area will remain in terms of poor energy performance, reliance on carbon based fuels, and the limitations or lack of shared transport opportunities, jobs and services. The Strategy should promote policies which allow these issues are to be addressed.</p>	
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6977	<p>The Diocese of Norwich The Diocese of Norwich fully support the spatial vision for the Joint Core Strategy Area. The Diocese of Norwich particularly welcome identification of Wymondham as a Main Town and the identification of Hingham and Poringland / Framingham Earl as Key Service Centres.</p> <p>Wymondham is a sustainable location for further development, owing to the excellent range of services and facilities that are provided in the town. Wymondham is also well located in terms of its accessibility by public transport. To this end, it is entirely appropriate that Wymondham is identified as one of four Main Towns.</p> <p>We also support the identification of Hingham and Poringland / Framingham Earl as Key Service Centres. Both Hingham and Poringland / Framingham Earl benefit from a range of services and facilities appropriate for that of a Key Service Centre. To this end, it is entirely appropriate that Poringland / Framingham Earl and Hingham are identified as Key Service Centres.</p>	
6996	<p>Barnham Broom Parish Council Yes, except that we would suggest addition of completion of the A11 dualling is added to the requirements</p>	
7004	<p>Natural England We are unclear about your definitions of the words 'critical' and 'essential' and how they are being used in this context. A better approach might be to highlight what you feel are essential infrastructure requirements, and then say what are the highest priorities. We certainly regard improvements to water supply and sewage disposal as essential to safeguard internationally designated sites in response to increased growth. We would also consider green infrastructure to be essential and of high priority. Our comments on the NNDR and the A47 are part of a separate consultation.</p>	
7081	<p>Hevingham Parish Council Yes, apart from the NDR not connecting to the A47</p>	



7105	<p>Sustrans No We believe that it is premature to conclude that this infrastructure is essential. The need for the infrastructure will depend on demand and how that demand is managed and demand is changing very rapidly at present eg the significant reductions in petrol consumption following the price rises in 2008.</p> <p>In terms of the road infrastructure the case will need to be justified using NATA (DfT analysis) and since this is being refreshed it is not possible to say what the outcome will be in a few years time.</p> <p>Whilst there will clearly need to be road infrastructure for the new housing there is no justification for major new infrastructure without taking serious steps to reduce demand. Sustrans believes that all major urban areas need to be moving towards achieving the sort of modal shares achieved by the best towns and cities on the continent and believes that Basel would be a good model for Greater Norwich. In Basel 75% of all trips are by walking, cycling or public transport. If this sort of modal share is achieved in Norwich by 2026 there would be a significant reduction in car traffic in Norwich despite the increased population. We do not believe that modelling for new infrastructure reflects this modal share and therefore consider the infrastructure requirements incorrect. The Infrastructure requirements should in fact be major new walking, cycling and public transport infrastructure and traffic restraint measures as necessary. Sustrans believes that this sort of modal share is essential for a number of reasons:</p> <ol style="list-style-type: none">1. Health and the urgent need to increase walking and cycling.2. The impact of peak oil which will mean that oil will be much less readily available for burning in cars.3. Social equity, because car travel is likely to be unaffordable for many.4. Greenhouse gas emissions and Climate Change. With the need to reduce greenhouse gas emissions by 60% by 2031 (Regional target) transport has to play its part and transport should aim to cut greenhouse gas emissions by 60% by 2031. A lot of research has been done on this including the VIBAT study see http://www.ucl.ac.uk/~ucft696/vibat2.html This showed that with a package of measures aimed at improving vehicle efficiency, vehicle occupancy, reducing distance travelled and achieving modal shift the target could be achieved. <p>This would be seriously undermined by major new road infrastructure, which should in any case be unnecessary if major modal shift is achieved.</p>	
7106	Tesco Stores Ltd Yes	
7133	<p>Savills We acknowledge that there will be a need for investment in critical infrastructure across the sub-region in order for the strategy to be a success. Alongside the Core Strategy a Delivery Plan is needed which considers how infrastructure is to be provided, including consideration as to how major pieces of infrastructure, such as NNDR which will be of benefit the whole sub-region, will be achieved. The landowners would wish to work with the GNDP to facilitate delivery of the strategy.</p>	



7177	<p>Hopkins Homes Ltd As I outlined within your earlier consultation exercise in February 2008, whilst broadly supportive of the principle of directing the majority of new homes, jobs and the associated infrastructure towards Norwich and its immediate surroundings. Hopkins Homes strongly suggests that without the commitment of significant financial resources to support the creation of some of the growth options currently suggested and apparently favoured, delivery within the desired timescales will prove difficult to say the least.</p> <p>Given that the housing figures contained within the draft Regional Spatial Strategy are provided as a minimum, together with the fact that failure to achieve what are acknowledged as 'challenging' development targets within the Sub-Region would have serious economic and social consequences all round, Hopkins Homes has previously contended to the Partnership that a significant increase in the levels of homes and jobs proposed within the rural areas of the District should be actively considered</p>	
7183	<p>Savills Not only is it critical to identify infrastructure required, but it is also critical to take account of the likely timing of provision of such infrastructure. A number of employment developments, such as at the airport, are reliant on the provision of major infrastructure and consequently are unlikely to be able to be available in the short to medium term.</p>	
7230	<p>Mr Richard Atkinson The critical infrastructure requirements have been correctly identified</p>	
7249	<p>Les Brown Associates Yes, but further studies required as in Aylsham</p>	
7260	<p>Barton Willmore The Technical Consultation document sets out proposed critical infrastructure requirements for growth at paragraph 6.2. Identified requirements include:</p> <ul style="list-style-type: none"> • Northern Norwich Distributor Route and the implementation of the Norwich Area Transportation Strategy • Investment in junction improvements on the A47 • Improvements to water supply and sewage disposal <p>The document also notes that "Essential supporting infrastructure such as the Long Stratton bypass, green infrastructure, schools, emergency services and health care will also be provided. Local infrastructure including affordable housing will be provided as part of development."</p> <p>There is a general acceptance that the Northern Norwich Distributor Route (NNDR) will be developed in line with the proposed growth over the next 20 years, and Phillip Jeans Homes have no objection in principle to this identified infrastructure requirement. Further explanations from the GNDP as to how the NNDR will be funded, however, are encouraged. Clearly the GNDP cannot rely on potential development areas in other parts of the Core Strategy area to fund the proposal when such developments will not have the same effect on capacity as development in the North East Norwich area. Small scale developments such as that proposed by Phillip Jeans Homes on their site at Loddon cannot be expected to make significant contributions towards the provision of the NNDR when the effect of development, particularly at such a small scale, in this location is only likely to have the</p>	



	<p>most nominal bearing on overall capacity.</p> <p>Improvements to water supply and sewage disposal are acknowledged as essential when planning for the development of the scale proposed. There is a requirement that Anglian Water under the provisions of the Water Industry Act 1991 make provision for new residential and employment development. Under the Water Industry Act 1991 Anglian Water are required to upgrade facilities every five years; accordingly, if Phillip Jeans' site at Loddon were allocated for small scale development, this should rightly be factored into their programme of upgrading. Ensuring that small scale developments such as that proposed by Phillip Jeans Homes are factored into planned upgrades will avoid questions over deliverability of the site in this respect.</p> <p>Phillip Jeans Homes accept that some contribution to local infrastructure may be required as part of a small scale development of 100 - 200 dwellings at Loddon and would expect an appropriate level of contribution to be ascertained during the application process</p>	
7274	<p>Bidwells Wrenbridge (Harts Farm) Ltd acknowledge that there are critical infrastructure requirements for growth at certain locations. However, Wrenbridge (Harts Farm) Ltd do not accept that the critical infrastructure is required to be delivered before any growth occurs in the Norwich Policy area. For instance, growth along the A11 corridor, including at Wymondham should not be contingent on the Norwich Northern Distributor Route being completed.</p>	
7295	<p>Breckland District Council As an adjoining authority to the Greater Norwich Development Partnership (GNDP) the Council welcomes the opportunity to participate in the Technical Consultation and share some evidence that has emerged as a result of the preparation of the Breckland Local Development Framework Core Strategy. In particular the strategy in Breckland to focus significant development along the A11 corridor at Attleborough, Snetterton and Thetford needs to be co-ordinated with the emerging options for strategic growth in the A11 corridor covered by the GNDP. The issues of energy supply and transport networks on the A11 and A47 corridors are of principal concern to Breckland.</p> <p>The principal issue relates to co-ordination of growth along the A11 corridor and the requisite infrastructure availability to support the cumulative growth in the GNDP area and adjoining growth locations in Breckland. You will see from our submission that we refer to an A11 Energy Study which when finalised (within the next 2 weeks) we will be happy to circulate to the GNDP as evidence base.</p> <p>The following comments are provided in order of the issues/questions raised in the document.</p> <p>Pages 14-15: Key External Linkages</p> <p>Breckland Council welcomes the recognition under section 4.4 that there are key external linkages from the Core Strategy area along the A11 corridor, including significant growth at Attleborough and Thetford. The Council also welcomes the acknowledgement that the Brecks are an important visitor attractor but seeks clarification on what is meant by the</p>	



	statement the Brecks have "further potential". This element of the Joint Core Strategy should be subject to Appropriate Assessment to ensure that the recreational and visitor impact of growth in the Core Strategy area does not have an adverse impact on the European habitats in the Brecks. Breckland has developed a significant evidence base around visitor and recreational impact on The Brecks and would be able to provide this evidence base to the GNDP to enable the Appropriate Assessment to be completed.	
7304	Cringleford Pavilion We note that all 3 options include significant housing sites that will feed more traffic into the A11. Much of this increase in traffic will head towards Norwich via the Thickthorn and Round House Way roundabouts. The Thickthorn roundabout is particularly busy and we have doubts that it could be improved very easily to take more traffic. Any increase in traffic would also make the A11 through Cringleford even busier. The Round House Way roundabout has already suffered a number of serious accidents involving cars overturning and the crash barriers have been broken on a number of occasions and this will make the pedestrian crossing on the A11 dangerous.	
7312	Norwich Green Party We note that the Spatial Vision has been expanded from its draft version to, for instance, talk more specifically about different locations and settlement types. We applaud the prominence given to 'Climate change and sustainability' but, as detailed in our full response to 'issues and options', question how the strategy lives up to these aspirations. A few points to note: the figure given for new homes which are said to be required has been increased from 37,500 in the 'issues and options' document to 40,000 now (in the Norwich Policy Area from 33,000 to 35,000). The Spatial Strategy 3. We are glad at the inclusion in the Spatial Strategy of the assertion that the level of growth depends on sufficient infrastructure funding from 'other agencies' which includes central government. It is surprising, given the stated need for a modal shift away from car use, that 2 out of the 3 'Critical infrastructure requirements' are to do with upgrading the road network. The other - 'Improvements to Water Supply....' - touches on an issue which, if an environmentally responsible path was pursued, could well act as a brake on development.	
7330	North Norfolk District Council North Norfolk District Council welcomes the publication of the Core Strategy technical consultation and supports the overall approach taken in the plan. NNDC particularly welcome the transport improvements that will improve accessibility from North Norfolk into the Norwich area, in particular: <ul style="list-style-type: none"> • The Northern Distributor Road • New rail halts at Broadland Business Park and Rackheath and improved rail services from Wroxham 	
7338	Stratton Strawless Parish Council Yes, but query to North/ South link	
7346	Mr Jim Hamshaw Yes, except that we would suggest addition of completion of the A11 dualling is added to the requirements	



7355	<p>Bramerton Parish Council We are not convinced that sufficient recognition has been given to the needs of smaller villages such as Bramerton.</p> <p>We are situated in the Countryside 5 miles from Norwich, which is the location for employment for many residents, 6th form education and major shopping outlets. Public transport operates to and from Norwich only 6 days per week with the last bus at about 6 o'clock. It is therefore useless at other times for late working or evening recreation. It is inefficient for activities away from the City Centre, where efficient transport interfaces are required. There is no convenient Park and Ride location from this direction and the opening hours restrict use outside the working day. Public transport is also inadequate or non existent for obtaining services from Rockland St Mary or Poringland, although there is a school bus to Framingham Earl High School.</p> <p>Private cars will remain the most realistic form of transport for many activities undertaken by our residents and we are concerned that the focus on public transport, walking and cycling within Norwich may lead to increased barriers to private car access to the City from villages such as Bramerton. We are seeking recognition of the requirements of Norwich from villages such as Bramerton and the equal contribution that our residents make to the local economy. The strategy should provide solutions which will improve the lives of our residents as well as those of the planned development points and the major service locations and we can see little evidence of that.</p>	
7361	<p>IE Homes and Property Yes</p>	
7393	<p>IE Homes & Property Ltd Yes</p>	
7426	<p>Environment Agency (Eastern Area Office) We consider the key infrastructure has been cited.</p> <p>7 Policies for Places</p> <p>We support Policy 3 for Norwich City Centre, in particular we support the inclusion of green infrastructure which will be vital given the planned growth of the city. It is important that creation of and improvements to green infrastructure are planned in advance of development. They could for example be used where flood risk is considered to be high. In some cases green infrastructure may also require time to establish and therefore careful planning will be necessary.</p>	
7455	<p>Hethersett Parish Council A - Yes</p>	
7497	<p>Bidwells Bidwells acts on behalf of Mr Martin Green and the Norwich Consolidated Charities (hereafter 'Mr Green') for the above site and has been asked to make a response to the current consultation on the Joint Core Strategy and associated Strategic Housing Land Availability Assessment (SHLAA). Mr Green considers that the 2.2ha site, north of Town House Road, Costessey could accommodate approximately 88</p>	



	<p>dwellings, based on an average density of 40 dwellings per hectare (given its position in the Norwich fringe). Mr Green considers that, as this is a technical consultation stage, only certain questions in the Core Strategy document necessitate answering in relation to their interests.</p> <p>Spatial Vision</p> <p>The Spatial Vision is welcomed as a coherent and cohesive vision for the Greater Norwich area, reinforcing the existing strengths and qualities of the area and seeking to deliver significant new housing growth in the most sustainable manner.</p>	
7518	<p>King Sturge The policy document sets out three key pieces of "critical infrastructure" to enable the envisaged growth to be delivered. These include the Northern Norwich Distributor Route; Junction improvements to the A47; and, improvements to water supply/sewage disposal. It is agreed that these are critical infrastructure requirements and are supported by Mr Andrews. Indeed, improved transport links will best facilitate growth to the North East of Norwich, in line with the proposed options in the Regional Spatial Strategy.</p>	
7529	<p>Mr Richard Atkinson The critical infrastructure requirements have been correctly identified</p>	
7550	<p>Norfolk Constabulary</p> <p>Overall Spatial Planning Objectives: - Objective 2 To be a place where people feel safe in their communities</p> <p>Norfolk Constabulary supports this objective 2. The future built environment will be enhanced if all development is 'secured by design' as a planning requirement.</p> <p>Infrastructure</p> <p>Norfolk Constabulary objects to this question on the following grounds:- The scale of new development within the districts has the potential to impact on police resources which can include the need for additional capital investments in new police facilities and funding for additional police officers and police staff. The current list of essential infrastructure requirements is deficient and should make specific reference to the police. (Although it is mentioned later on page 62 - table 2).</p> <p>The need for capital contributions towards public services such as the Police, which are directly and proportionally related to the likely impact of the development has recently been accepted by the Planning Inspectorate on representations made to North Norfolk District Council's Core Strategy. See Inspector's Report pages 92 & 93 on Policy CT2 - Developer Contributions, details of which are outlined below:</p> <p>"6.215 The policy aims to ensure that where new development places extra demands on physical infrastructure and social facilities it should contribute towards the public costs of resolving or mitigating its impact. Such a policy is expected to comply with national principles set out in government circular 5/05 and the related DCLG good practice guidance.</p>	



	<p>6.216 The Council intend to amplify the operation of the policy by the production of a SPD on the detailed nature and mechanism of the policy in line with the principals and advice in Circular 5/05 and the good practice guidance. This would be able to take account of the government's proposals to introduce a new Community Infrastructure Levy, including if necessary any consequential changes to policy CT2 to make it compatible with the latter. Such amplification would be able to address most if not all of the concerns raised by participants at the examination hearing session on this topic.</p> <p>6.217 Two minor changes suggested by the Council would avoid unnecessary duplication on part of CS policy SS2 and provide clarification as to how and when the policy would be triggered by developments of both 10 and more dwellings and substantial commercial development, while also clarifying the types of infrastructure, services and facilities for which contributions may be sought. The latter could include a range of public services, including capital contributions to public services such as the Police, providing that such contributions were directly and proportionally related to the likely impact of the development..."</p>	
7572	<p>Norfolk Wildlife Trust We support inclusion of improvements to water quality and sewage disposal as critical infrastructure. In our view because of its links to sustainability and quality of life Green Infrastructure should also be seen as critical. The evidence for this has been set out in the GNDP Green Infrastructure Strategy and supporting reports on ecological networks drawn up by the Norfolk Biodiversity Partnership.</p> <p>We do not support specific junction improvement on roads as being of similar standing or naming of NDR. Rather this should be replaced by "implementation of NATS" only.</p>	
7597	Thurton Parish Council Yes	
7608	<p>Trafford Trust Estates</p> <p>2. INTRODUCTION</p> <p>2.1. In a letter dated 1st August 2008, the Greater Norwich Development Partnership Manager invited Brown & Co to participate in a Technical Consultation in connection with the preparation of the Joint Core Strategy. Brown & Co, on behalf of the Trustees of The Trafford Trust Estate, have requested that a response be submitted on the content of the emerging JCS with regard to the potential of land at Rackheath, Spixworth and Wroxham to deliver elements of the proposed policy framework. Their land can contribute towards the achievement of a sound spatial strategy and make a meaningful contribution to the delivery of the new employment and housing required in the Norwich area by virtue of Policy NR1 of the East of England Plan.</p> <p>2.2. Our clients agree with the comment at paragraph 13.68 of the East of England Plan to the effect that the Norwich area has the potential to develop further as a major focus for long term economic development and growth. In the light of this policy perspective, it is important to ensure that the Joint Core Strategy provides a robust and flexible spatial strategy, capable of realising the potential of the Norwich area in the period to 2021 and beyond.</p>	



	The JCS should secure the base from which the necessary step-change in economic and housing delivery is achieved in the short/medium term whilst identifying a sound spatial policy framework for the longer term.	
7614	Yare Valley Society Our concern is to see that the provisions for major new developments around Norwich have full regard to the need to protect the natural environment and features of particular environmental importance. We are, of course, primarily concerned for the protection of the Yare Valley and its recognition as a vital green corridor in an area under great pressures for development. We feel that the environmental importance of the river valleys needs to be stressed. The importance of the river Yare west of the city (particularly because of its location in relation to potential developments) is not fully acknowledged in the relevant sections of the document.	
7616	<p>CGMS Ltd The critical infrastructure requirements have been correctly identified This response is made on behalf of the promoters of the Rackheath Eco-community • Barratt Strategic, Manor Farm Rackheath Ltd and Building Partnerships.</p> <p>Introduction</p> <p>Since our initial representation to the Issues and Options document, which sought to promote the development of land at Rackheath for a sustainable community, progress on the Government's Eco-towns initiative has led to the identification of the north-east sector of Greater Norwich as a potential site for an Eco-community. This is entirely consistent with our earlier proposals, but would imply a greater scale of development. We are currently revising our proposals and it is likely that we will be bringing forward revised proposals for a settlement of around 4000 new dwellings. The intention is that this development should be fully integrated with the existing settlement at Rackheath, and the established industrial areas, to create a community of around 5000 dwellings with a full range of services and facilities. This is being planned in accordance with the government's Eco-towns objectives and standards - as set out in the DCLG Eco-towns progress report of July 2008. We believe that the Eco-community will be consistent with the aspirations of the emerging Joint Core Strategy and consider that it is important that it is brought forward as part of a strategic planned approach to the area endorsed by the key stakeholders.</p> <p>We welcome the fact that the Strategy sees new communities as a means of delivering strategic levels of growth in the Norwich Policy Area. The vision of each one being "a distinctive high quality sustainable community with a vibrant and attractive district centre and a network of local centres serving existing neighbouring communities and new residents alike providing shops, health, education and community services easily accessible by foot, bicycle and public transport" is exactly what we will be trying to achieve at Rackheath. In our response to the Issues and Options document we highlighted how the community at Rackheath would meet the objectives of the Strategy.</p> <p>Critical infrastructure (Question1)</p> <p>We agree with your assessment of the critical infrastructure requirements</p>	



	<p>and as part of the Eco-community development process we will be working with the utility companies to ensure that appropriate improvements to water supply and sewage disposal are secured. However in accordance with sustainability principles we will be designing the development to minimise both water consumption and the need to dispose of waste off-site. We would anticipate that similar approaches will be adopted for the other major allocations identified in the emerging Strategy, thus reducing pressures on existing infrastructure and the need for significant investment to secure improvements to it.</p> <p>While the Northern Norwich Distributor Route is not critical to the Rackheath Eco-community, we consider that its implementation will benefit economic development in the area. In addition it will provide a key orbital route, which will enable us to develop high quality public transport links between the Broadlands Business Park area, the community and the Airport. Implementation of the Norwich Area Transportation Strategy will also support our proposals for wider cross-city public transport connections. The provision of affordable housing is a key concern and we are currently planning on the basis of up to 40% affordable housing in the Ecocommunity. It is important that all major developments are self sufficient in the key services as far as possible. New development can also bring benefits to existing communities by providing critical mass to allow service levels to be enhanced.</p> <p>Policies for Places</p> <p>Policy 1 Settlement hierarchy - we agree with the hierarchy as proposed.</p> <p>Policy 2 Strategy for growth in the Norwich Policy Area - we agree with the overall strategy. While we do not disagree with the strategic locations for employment development, it is important to retain flexibility and there is a danger that this could be threatened by implied restriction on types of uses at the Airport and Hethel in particular. Proposals for the Northern Distributor Road, bus rapid transit and new rail halts at Broadland Business Park and Rackheath are supported. The Eco-community is actively investigating the prospects for high quality public transport, including innovative rail services on the Wymondham - Norwich - Wroxham axis</p>	
<p>7640</p>	<p>Bidwells Land north of Gt Melton Road, Hethersett: response to Joint Core Strategy and Strategic Housing Land Availability Assessment • representation on behalf of Gladedale (Anglia) Ltd</p> <p>Gladedale (Anglia) Ltd welcomes the Spatial Vision is welcomed as a coherent and cohesive vision for the Greater Norwich area, reinforcing the existing strengths and qualities of the area and seeking to deliver significant new housing growth in the most sustainable manner.</p> <p>In Policy 5 (questions 3-12), the locations for major change and development in the Norwich Policy Area), Option 1 or 2 is strongly preferred over Option 3. Hethersett/ Little Melton is situated very close to Norwich and nearby centres of activity, including Norwich Research Park, University of East Anglia, Norfolk and Norwich University Hospital, Wymondham and the Longwater Employment Area. It is located on the A11 is very close to Thickthorn Park & Ride site and has fast and frequent bus connections to Norwich and Wymondham. Hethersett therefore enjoys excellent public</p>	



transport (bus) links to Norwich city centre, first-class road links (for freight and car travel) along the All corridor and (via Wymondham train station) good rail links to Norwich and Cambridge. The village also has a good range of shops and services meeting everyday needs.

Bidwells and Gladedale (Anglia) Ltd have already undertaken a considerable amount of work promoting Hethersett/ Little Melton as a strategic growth location and initial investigations (e.g. on utility services, healthcare, education and the natural environment) have highlighted the strengths of the location, as well as identifying challenges to overcome.

There appears to have been very little background work undertaken on the Mangreen/ Swardeston/ Mulbarton/ Swainsthorpe area (questions 13-17), as this is the first time this potential site has appeared in the Joint Core Strategy. There are a number of unanswered questions and lack of published evidence in respect of the areas ability to contribute to delivery of housing in the Norwich Policy Area at the rates anticipated in the East of England Plan. In conclusion, Gladedale (Anglia) Ltd believes that Hethersett/ Little Melton has the best chance of providing a sustainable community capable of delivering housing at the rates required to make a significant contribution to the NPA's housing target for the plan period.

Policy 7 (Key Service Centres) allocates specific housing numbers to each of the ten chosen Key Service Centres. Hethersett is identified as being suitable for 20-50 dwellings, unless it is chosen as a major growth location. However, although Policy 5 apportions 2000 dwellings to smaller sites in South Norfolk, the approximate housing provision for South Norfolk in the Core Strategy (i.e. the Main Towns, Key Service Centres and Service Villages, but excepting V'4'mond ham) totals just 1280 dwellings. Whilst accepting that some small-scale development might be acceptable in Other Villages (Policy 9),

Gladedale (Anglia) Ltd believes that there still appears to be a fairly significant gap' of 720 dwellings not currently apportioned to South Norfolk settlements.

In addition, no distinction appears to have been drawn between those KSCs which are within the Norwich Policy Area and those which are outside the Norwich Policy Area. Whilst Gladedale (Anglia) Ltd has no objection to Acle, Reepham, Loddon/ Chedgrave and Wroxham being allocated 100-200 dwellings, it asserts that Hethersett is also eminently able to accept at least 200 dwellings, irrespective of whether it is chosen as a major growth location, because of its proximity to Norwich, location in the Norwich Policy Area, good range of local services and facilities, high quality transport links and choice of nearby employment opportunities - its level of services is little different to Acle, Reepham, Loddon/ Chedgrave and Wroxham. Given the apparent shortfall in allocated housing numbers to South Norfolk settlements, Gladedale (Anglia) Ltd believes that the case for increasing the allocation for Hethersett to a minimum of 200 dwellings is particularly strong.

It is suggested that, given the stricture in Policy HI of the East of England Plan that housing allocations are minimum targets to be achieved, rather than ceilings which must not be exceeded, the number of dwellings allocated to Hethersett should therefore be increased to a minimum of 200 dwellings.



7645	<p>Drivers Jonas We write on behalf of our client CEMEX, to submit representations in relation to the Broadland District Council, Norwich City Council, South Norfolk Council and Norfolk County Council Core Strategy Preferred Options Paper. Our client understands that the Core Strategy document is one of the key documents in the LDF as it will set out the strategic policies with regard to housing, employment and the natural environment.</p> <p>Background</p> <p>Nationally, CEMEX owns a number of strategic sites, which are either due to, or already ceased being in operational use. In accordance with National Planning Policy, CEMEX are seeking to promote these sites for alternative uses. Within Broadland District Council, Norwich City Council and South Norfolk Council, CEMEX owns 4 sites. The extent of these sites is shown on the attached plans and the addresses below:</p> <p>Kirby Cane Kirby Lane, Leet Hill, Kirby Cane, Norfolk.</p> <p>Bawburgh Lodge Farm, Bawburgh.</p> <p>Norwich Thorpe Road/ Griffin Lane, Thorpe St Andrew, Norwich.</p> <p>CEMEX Wymondham Silfield Road, Right Up Lane, Wymondham, Norfolk.</p> <p>Rather than comment on each of the policies separately, CEMEX considers that it is useful to highlight the key areas of support that would help meet their objectives for the development of their sites.</p> <p>CEMEX considers that it is useful to highlight the key areas of support or objection that are most relevant to the four sites identified. Principally our comments are made in accordance with Planning Policy Statement 12 (PPS12) - Local Spatial Planning (2008) and the 'tests' set out in paragraphs 4.51- 4.52, for assessing whether a development plan document is sound. Specifically, CEMEX wishes to ensure that the emerging policies within the new LDF are the most appropriate in all the circumstances, that they are founded on a robust and credible evidence base and ensure that the plan is reasonably flexible to enable it to deal with changing circumstance and comply with National Planning Policy.</p>	
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A short overview and summary of the potential land uses that CEMEX considers would be appropriate for each site is set out below, which provides the basis for our subsequent representations to the Core Strategy Preferred Options Consultation.

CEMEX Kirby Cane

CEMEX considers that the southern section of the site in Kirby Cane, highlighted in cross-hatch in the attached plan, could be developed to help accommodate some of the district's housing requirement. The southern Kirby Cane site would provide a natural sustainable extension to the existing settlement, close to existing facilities and infrastructure, in accordance with National Planning Policy Statement 1: Delivering Sustainable Development (PPS1) and Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7).

CEMEX Norwich

The site in Norwich is situated south of the Broadland Business Park, in Thorpe St Andrew's, an identified key strategic location in the Draft East of England Plan, and is close to existing residential development. CEMEX considers this site to be suitable for mixed use or employment led development due to its sustainable location near existing employment space and residential dwellings.

CEMEX Bawburgh

CEMEX's Bawburgh site is situated east of Bawburgh, next to Chapel Break. To the west of the site is the A47. The majority of the southern part of the site is within the Water Recreational Area (policy BAW1) of the South Norfolk Local Plan (2007). CEMEX therefore urges the Council to consider the site's potential for leisure related uses or for a water sports venue for the land edged in blue (please note not the land edged in red).

Wymondham

The site in Wymondham is situated on the edge of town, adjacent to land allocated for residential development in the South Norfolk Local Plan (2007). CEMEX considers this site to be suitable for residential development due to its sustainable location, close to existing road networks, residential development, services and facilities. CEMEX urges the Council to consider the site as a sustainable extension to the existing settlement.

Responses to the specific issues are set out below.

Main Locations of Growth Proposed

In reference to proposed Policy 1 "Settlement Hierarchy", CEMEX supports the development of sites within existing urban areas. In particular, CEMEX supports the principle that a greater level of development should be situated within Norwich and Wymondham. A large level of development within Norwich and Wymondham will ensure that new homes are located in accessible areas, with good access to existing infrastructure and public transport. In addition, if a high level of new homes are developed within Norwich and Wymondham, it will ensure that new homes have good access



	<p>to existing services and facilities, such as shops, healthcare and education. CEMEX considers this form of development to be in accordance with PPS1 and Planning Policy Statement 3: Housing (PPS3), both of which seek new development in existing settlements in accessible locations (PPS1, Paragraph 27 and PPS3, Paragraph 36).</p> <p>Although, CEMEX supports Policy 1, they still urge the Councils to consider development in smaller settlements. In particular, CEMEX urges the Councils to consider Kirby Cane for development. CEMEX considers distributing development evenly across the districts as a sustainable form of development, which accords with Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7), Paragraph 4, which seeks:</p> <p>"Limited development in, or next to, rural settlements that are not designated as local service centres, in order to meet local business and community needs and to maintain the vitality of these communities."</p> <p>In addition, CEMEX also supports proposed Policy 12 "The Hierarchy of Centres", which sets out the settlement hierarchy for retail, services, offices and other town centre uses. In particular, CEMEX supports the development of commercial uses within the Norwich urban area. Commercial development in this area would accord with Planning Policy Statement 6: Town Centres (PPS6), Paragraph 1.8, which seeks retail, leisure and entertainment, offices and arts, and tourism uses within town centres.</p>	
7654	<p>Highways Agency Further to your letter dated 1 August 2008 regarding the above Joint Core Strategy (Technical Consultation), the Highways Agency has the following comments to contribute.</p> <p>As this is a lengthy response, I am writing rather than completing the comment form that has been made available. The Highways Agency response is concerned with any impact on the two trunks within the Norwich Policy Area - they are the A11 and A47.</p> <p>Firstly, there appears to be an inconsistency regarding the planned number of homes - paragraph 1.3 of the technical consultation states that there are 25,400 homes that need to be identified and paragraph 1.11 states the figure to be 24,000 homes.</p> <p>Of the twelve spatial planning objectives outlined, the following are relevant to the Highways Agency:</p> <ul style="list-style-type: none"> Objective 4: To allocate enough land for housing, and affordable housing, in the most sustainable settlements Objective 5: To promote economic growth and diversity and provide a wide range of jobs within Broadland, Norwich and South Norfolk Objective 6: To make sure people have ready access to services Objective 10: To enhance infrastructure provision to meet the needs of existing and future population Objective 11: To reduce the need to travel <p>The Highways Agency has previously supported these objectives in earlier responses.</p> <p>Objective 5 and objective 12 (to positively protect and enhance Norwich's individual character and unique cultural infrastructure) are likely to have</p>	



	<p>implications on the Trunk Road network as they may result in tourists and other trips to the Norwich area.</p> <p>The remaining objectives do not directly relate to the Highways Agency. Policies</p> <p>Policy I • Settlement Hierarchy The hierarchy has changed slightly since the one listed in the 'Issues and Options' report from November 2007. The main change is the inclusion of mixed-use developments near the top of the hierarchy. The proposed locations could have a significant impact on the Trunk Road network.</p>	
7664	<p>Ifield Estates Limited Further to your letter dated 1st August last, I write on behalf of Ifield Estates Ltd in support of the approach adopted within the Technical Consultation to the emerging strategy for employment development in the Norwich Policy Area. Ifield Estates Ltd control land immediately adjoining the existing Broadland Business Park and are presently preparing proposals for Broadland Gate in the context of the Postwick Hub.</p> <p>Our clients endorse the approach undertaken within the Technical Consultation regarding the establishment of a sustainable spatial strategy which seeks to take forward the principles established at Policy NR1 of the East of England Plan 3 Court which requires that Norwich should be a regional focus for housing and employment development. In the context provided by the identification of Chivers Way Norwich's role as a Key Centre for Development and Change, the strategy for employment growth is expected to focus on key locations, including Thorpe St Andrew. Policy NRI of the EEP refers to business park uses at Thorpe St Andrew.</p> <p>In the light of the policy direction established in the East of England Plan, we endorse that element of the Spatial Vision which notes that business investment in the area "will support and create a sustainable, diverse, thriving economy 0122.3 202100 accessible and appropriate to the needs of all the community" and that "investment at strategic and other employment locations will have helped create a stronger economy' including an enhancement of employment opportunities at 01223 237202 Thorpe St Andrew. In addition, we support Objective 5 which notes that existing employment sites will be safeguarded "and enough land for employment development will be allocated in line with the Regional Spatial Strategy. This is to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate." Objective 5 states that, within the Norwich Policy Area, Thorpe St Andrew will be the focus of further jobs growth. Ifield Estates Ltd strongly support this objective</p>	
7669	<p>Mr Robert Debbage Mr Debbage generally welcomes the Spatial Vision as a coherent and cohesive vision for the Greater Norwich area, reinforcing the existing strengths and qualities of the area and seeking to deliver significant new housing growth in the most sustainable manner.</p>	



7672	<p>Barton Willmore</p> <p>Policy 1 - Settlement Hierarchy</p> <p>2.1 Policy 1 sets out the hierarchy for the scale and growth of development within the Joint Core Strategy Area, as follows:</p> <ol style="list-style-type: none"> 1. The urban area of Norwich, including the urban fringe parishes 2. Major mixed-use developments in specified locations within the Norwich Policy Area 3. Main towns 4. Key service centres 5. Service villages 6. Other villages <p>2.2 Policy 1 adds that the scale of development will decrease at each level of the hierarchy. The Little Plumstead Hospital Site is located within Norwich Policy Area (as identified at Policy 8), and was previously shown as within the Norwich 'urban fringe' when Broadland District Council published their previous Core Strategy Issues and Options. Little Plumstead Hospital should therefore be included within category 1) above as an urban fringe parish and the most preferential area for new development within the Joint Core Strategy area.</p>	
7689	<p>Trustees of Beston Estate Yes</p>	
7710	<p>Poringland Parish Council We accept the critical infrastructure list, however we would like added 'a cessation of traffic restriction in and around the core commercial areas of Norwich'. The progressive strangling of through and circulation traffic in and around Norwich will result in enterprises moving out to places where there are fewer restrictions on travel to work and the movement of goods.</p>	
7712	<p>Cringleford Parish Council We note that all 3 options include significant housing sites that will feed more traffic into the A11. Much of this increase in traffic will head towards Norwich via the Thickthorn and Round House Way roundabouts. The Thickthorn roundabout is particularly busy and we have doubts that it could be improved very easily to take more traffic. Any increase in traffic would also make the A11 through Cringleford even busier. The Round House Way roundabout has already suffered a number of serious accidents involving cars overturning and the crash barriers have been broken on a number of occasions and this will make the pedestrian crossing on the A1 1 dangerous.</p>	
7718	<p>Kimberley & Carleton Forehoe Parish Council The Long Stratton bypass should be a bullet point of the critical infrastructure requirements for growth. The building of this bypass provides a unique opportunity for the appropriate planning of a properly designed 'main town' with the correct infrastructure to support it. No other area provides this opportunity.</p>	



7756	<p>Entec UK The identified critical infrastructure should be consistent with the findings of the Norwich Growth Area Infrastructure Need and Funding Study (December 2007). The study states that:</p> <p>"The two most significant and urgent issues to be addressed relate to clean water provision in Norwich City Centre and Gas and Electricity supply to some of the key employment growth locations in particular Broadland Business Park and the Airport."</p> <p>The Core Strategy should also require additional utility provision to facilitate the required growth.</p>	
7786	<p>Long Stratton Parish Council To include leisure facilities and that an A140 Bypass needs to be an absolute must and it to be guaranteed that it would be in place before any development as in Options 2 & 3 are even considered further. It is already desperately needed as things are, and should definitely be in place before more development takes place other than that already approved or there is any modest infilling. The NDR should be a complete road not just part needs to join the A47 to the west.</p>	
7812	<p>NHS Norfolk Yes</p>	
7837	<p>Scott-Brown Partnership No. The question gives limited options based on a definition of the Norwich Policy Area which as defined in Appendix 4 of the Draft Core Strategy is at odds with the Regional Spatial Strategy.</p> <p>In para.13.68, the approved RSS defines the Norwich Policy Area as the urban area of Norwich, the "first ring" of villages and the market town of Wymondham. Long Stratton is not mentioned and clearly falls outside of the "first ring", yet its inclusion in the NPA and appearance in each of the 3 development options is a "given" in the Draft Strategy.</p> <p>No other options are set out and no opportunity to examine the extent of the NPA is provided.</p> <p>The following questions are wrongly predicated on the assumption that the NPA is fixed - whereas it is not - and the allocation of housing numbers within it is also fixed - again it is not as Policy H1 of the RSS states: District [housing] totals for Norwich, Broadland and South Norfolk are indicative only and may be varied by mutual agreement provided they sum to 57500.</p> <p>The Core Strategy is not sound in that it is incompatible with the RSS, gives no reasons why this is so and provides no opportunity to discuss the strategic issues involved.</p>	



7849	<p>Sport England Sport England is the government agency responsible for developing a world-class community sports system. On Tuesday 10 June 2008 we published a radical new strategy to get more people playing and enjoying sport and to help those with talent get to the very top. The new approach is designed to capitalise on the once-in-a-lifetime opportunity presented by the London 2012 Olympic and Paralympic Games, and to use its power to inspire more people to take part in and succeed in sport.</p> <p>The strategy commits Sport England to deliver on a series of demanding targets by 2012/13:</p> <ul style="list-style-type: none">• one million more people doing more sport• a 25% reduction in the number of 16 year olds who drop out of five key sports• improved talent development systems in at least 25 sports• a measurable increase in people's satisfaction with their experience of sport• the first time the organisation has set such a qualitative measure• a major contribution to the delivery of the five hour sports offer for children and young people. <p>We have a long standing commitment to land-use and spatial planning as a way of helping to achieve these targets and we therefore welcome the opportunity to comment on key strategic documents such as the GNDP Core Strategy.</p> <p>With regard to specific questions raised in the above document, we would make the following comments</p> <p>Question 1</p> <p>Sport England support the identification of major transport, drainage, schools and health provision as critical infrastructure, but feel that formal and informal indoor and outdoor sports facilities should also be identified, as it is only through the provision of these facilities (as well as other key cultural facilities) that it will be possible to deliver genuine sustainable communities that enhance well-being and quality of life for both new and existing communities.</p>	
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Q2. CITY CENTRE - Are you aware of any major issues that would prevent delivery of this proposed policy?		
	There were 32 responses to this question. Five say there are no issues.	
	Key issues raised include water supply and drainage, city centre development and traffic, SSSIs and nature reserves, policing, preserving the historic environment, transport infrastructure, scale of development and retail, leisure, office and culture uses in other growth locations, growth in Cringleford, traffic growth, regeneration, hospital capacity, objections from residents, the water cycle study, strategic flood risk, crime in Norwich City Centre, open space improvement, and Broadlands Business Park. Communities specifically mentioned include Norwich, Catton Grove Chalk Pit; Sweetbriar Road Marshes, St James Pit, Wensum Valley (Mile Cross & Sycamore Crescent); Mousehold Heath, Lion Wood, Wymondham, Cringleford, Colney. Cosstessey, Trowse, Poringland, Thurton, Loddon and Chedgrove, Sprowston, Rackheath, Norwich, Wroxham, Hethersett, Long Stratton, Stoke Holy Cross, Colney, and Costessey,	
6840	Anglian Water Services Ltd The sewerage system in the city centre is at capacity. Development should be designed so as to not exacerbate the current situation	
6905	Greenhouse Environment/ Co-op Learning Network say there is a need to address the potentially conflicting nature of different forms of development in the city centre. In particular, the continued - albeit slower - growth of city centre housing will only succeed if policy ensures that the quality of the local environment in the city is conducive to peaceful residential life. Specifically, delivery and service vehicles visiting shops and offices in the city must not be allowed to disrupt the peaceful enjoyment of city-centre dwellers' homes.	
6915	Theatres Trust support this policy as it contains all the vital elements to maintain Norwich in its role as the regional centre. It is expected that a Core Strategy should contain a policy to introduce a strategy for the town centre.	
6997	Barnham Broom Parish Council say over-willingness of certain city authorities to accept objections to the stated focus objectives of retail, leisure, office and culture from city centre residents may be an ongoing issue (eg development of St Andrews Hall into a proper concert hall)	
7005	Natural England draw attention to a number of nationally designated sites within the Norwich City outer ring road boundary, which will need to be taken into consideration: Catton Grove Chalk Pit Site of Special Scientific Interest (SSSI); Sweetbriar Road Marshes SSSI and St James Pit SSSI. There are also three local nature reserves: Wensum Valley (Mile Cross & Sycamore Crescent); Mousehold Heath & Lion Wood, and some significant small-scale greenspace, such as the riverside walk, with opportunities for buffering and enhancement.	



7082	Hevingham Parish Council City Centre development seems to include lots of flats (apartments) but not included in Policy	
7092	Norfolk Landscape Archaeology Yes. Developments must preserve the historic environment of the city (including buried archaeology). Developments within the area defined by the medieval city walls (the Area of Main Archaeological Interest in the Norwich Local Plan) are likely to impact on archaeological deposits. Policy 3 point one should reflect this. e.g. "Enhancing the historic city, including its built, historical and environmental assets etc."	
7107	Tesco Stores Ltd No. However it must be recognised that not all comparison goods floorspace (bullet point 3) needed in the Norwich and wider area should be accommodated within the city centre only. It is important that there is a provision at the local level, in other parts of Norwich and the wider area.	
7231	Mr Richard Atkinson One of the keys to success of the city centre strategy will be the implementation of high quality public transport to connect the centre to its catchment	
7261	Barton Willmore Phillip Jeans Homes are not aware of any major issues that would prevent the proposed development within the City Centre but remain to be convinced that the scale of development proposed will be implemented within the given timescales particularly given the market issues with flatted developments and water supply and sewage implications.	
7275	Bidwells Wrenbridge (Harts Farm) Ltd can accept that the Norwich city centre should be a main focus of retail, leisure, office and culture. However, the Core Strategy needs to accept that such uses will also be required at the main new growth locations, to help support them. Wymondham in particular will require its own range of retail, leisure, office and cultural activities to support the existing population, and the anticipated expanded population. It is anticipated that Wymondham's retail, leisure, office and cultural activities will be complementary to similar activities in Norwich City Centre rather than in direct competition.	
7313	Norwich Green Party 4. The number of homes designated for Norwich itself is broadly acceptable, although we think it's important to note that developments currently being undertaken, such as Anglia Square, are not building to the density once intended due to the market downturn. This seems contrary to the intention 'for small and medium scale redevelopments to increase densities' as stated in Policy 4 of the Technical Consultation. The danger is that any shortfall may increase pressure to 'infill' on green spaces at a later date if future demand for inner city housing increases. This would be an outturn we would very much resist. 5. The confirmation of proposals for a 'bus rapid transit network' is to be welcomed, yet we need assurance that both public and private sectors have the commitment to make any new routes/services work even if they don't	



	<p>show an immediate profit. It is worth pointing out that a sufficient regularity of service, preferably at least once every 15 minutes, is shown to dramatically increase usage as passengers become less reliant on timetables. The lessons from the unfortunately abandoned orbital bus scheme need to be learnt.</p> <p>6. The statement that 'Reduction of the impact of traffic on residential areas will be facilitated by the construction of the NDR' simply does not ring true. For instance, recent County Council advice for the City Council's planning department in respect of an application on Boundary Road foresaw 'the likely increased traffic arising from the Northern Distributor Road'. It must also be pointed out that the 'missing section' of the NDR between the A1067 and the A47 could force much traffic to detour into the city. The resulting congestion along Sweet Briar Road in particular will inevitably have a knock-on effect and cause delays for the rest of the outer ring road, impacting especially on Boundary Road which has recently been the possible subject of an AQMO. All this will mean that 'cut-throughs' to residential areas will continue and very possibly intensify.</p> <p>7. While broadly happy with the areas identified in Policy 4 as 'priorities for regeneration' our concerns persist that investment will be concentrated in out-of-town areas rather than the districts themselves. We would also point out, firstly, that there are significant areas of deprivation not included such as Lakenham, Tuckswood and the Heartsease and, secondly, that it is important for smaller 'pockets' of deprivation in such locations as Town Close and Thorpe Hamlet not to lose out in an over-simplified assignment of funding.</p>	
7339	Stratton Strawless Parish Council No, but query no mention of extra hospital capacity	
7347	Mr Jim Hamshaw Over-willingness of certain city authorities to accept objections to the stated focus objectives of retail, leisure, office and culture from city centre residents may be an ongoing issue (e.g. development of St Andrews Hall into a proper concert hall)	
7362	I E Homes and Property No	
7427	<p>Environment Agency (Eastern Area Office) Two background studies are vital to the delivery of growth within the City Centre. The first is the Water Cycle Study (WCS). It must be ensured that the receiving sewer network is capable of managing the increase in flows which will increase through both climate change and the planned growth. Where improvements to the network are found to be necessary Anglian Water Services (AWS) will require time to plan and budget for the works. Careful phasing may overcome this difficulty but this will depend on the scale of improvements that are considered to be necessary. It is vital that a situation where development progresses ahead of corresponding improvement works to the sewer network is avoided.</p> <p>The second study is the Strategic Flood Risk Assessment (SFRA). This has shown much of the City Centre to be currently within Flood Zones 2 and 3 with the area affected increasing over time due to the impact of climate change. We understand that further work is to be commissioned on the SFRA to provide information on the varying degrees of hazard within Flood Zones 2 and 3. We support this study but, with reference to the delivery of sites, we would advise that a possible output of the study may be that some</p>	



	areas within the City Centre are shown to be unsafe for residential and/ or commercial development.	
7456	Hethersett Parish Council No comment	
7530	Mr Richard Atkinson One of the keys to success of the city centre strategy will be the implementation of high quality public transport to connect the centre to its catchment.	
7551	<p>Norfolk Constabulary –</p> <p>Norwich City Centre</p> <p>The Safer Neighbourhood Team area of Norwich City Centre has the highest level of crime out of the 52 neighbourhoods in Norfolk, making up 8.32% of the Force total crime demand.</p> <p>The level of crime in the Norwich City centre may have an adverse impact on the Policy Objective to focus on promoting retail, leisure, office and culture as a "destination". The Policy should also state "the main focus of city centre development should be to make Norwich a safe place to develop retail, leisure, office and culture activity".</p>	
7573	Norfolk Wildlife Trust We support need to improve open spaces and green linkages and walking and cycling provision but fear that potential improvements in these realms will be severely restricted by policies that give traffic flow priority.	
7598	<p>Thurton Parish Council Yes. We welcome support in the 'other villages' categories for Thurton, (Policy 1). We would like the opportunity to highlight the need for an improved level of service/ reliability and quality of the bus service serving Loddon/ Chedgrove/ Thurston to Norwich both in terms of settlement hierarchy (Pol 1) and proposals for Norwich City Centre (Policy 3)</p> <p>The City Centre 'dies' at 6 p.m. as an inadequate bus service fails to serve the needs of customers and workers in the retail/ leisure sectors. Also, the Park & Ride system could be extended past the 7.25 deadline.</p> <p>The public transport inadequacies are linked with the proposed scale of future growth which could not be sustained without substantial improvements in those services.</p>	
7617	<p>CGMS Ltd One of the keys to success of the city centre strategy will be the implementation of high quality public transport to connect the centre to its catchment.</p> <p>Policy 3 Norwich City Centre (Question 2) - we support this policy and consider that the key issue is how access to the city centre by non-car modes can be improved, so that all may benefit from the opportunities for employment, retail and leisure which the City centre uniquely provides. Funding for the delivery of the Norwich Area Transportation Strategy will therefore be critical to the success of the Joint Core Strategy.</p> <p>Policy 4 The remainder of the Norwich urban area - we support this policy, particularly the principle of enhancing links through green infrastructure and public transport/walking/cycling networks. While links to the City Centre from outlying areas are important, it will be desirable to consider also orbital public transport links between key employment destinations and new settlements/outlying residential areas.</p> <p>Policy 5 Locations for major change and development in the Norwich Policy</p>	



	<p>Area - we welcome the fact that all three options include reference to a development of 6000 new homes in the Sprowston/Rackheath area. We believe that this supports the view that an Eco-community at Rackheath is a robust option in strategic terms. In our planning we are endeavouring to create clear linkages between the Eco-community and development opportunities inside the planned Distributor Road, so that both may benefit from good access to new services and facilities. We would favour Option 1 as this would reinforce the concept of a north east - south west corridor which could facilitate the development of high quality public transport (both rail and bus) benefiting all in the corridor (Question 5). While all three options would link with our longer term investment strategy for the Rackheath Eco-community (Questions 6/11/16), we would question whether Option 3 is sustainable. In this context we are concerned particularly by the pressures that development near the A47/A140 junction would place on the transport system and the transport and environmental implications of locating significant development at Long Stratton.</p> <p>We note that the Regional Spatial Strategy is under review, for completion in 2011, and that this is likely to result in upward pressure on housing targets in the period to 2031. We also note your own indications that the North East sector may be expected to grow by a further 4,000 new homes beyond 2026. In preparing the masterplan for the Eco-community, we have considered that there is scope for future growth to take place on land to the east of the Eco-community and that this will be able to benefit from the newly established infrastructure, in particular access to the rail corridor and other key public transport links. It would also have good access to the "High Street" and education facilities within the Ecocommunity and would allow for further integration with the existing settlement at Rackheath.</p>	
7646	Drivers Jonas General Approach to Residential and Employment Allocations In terms of proposed Policy 2 "Strategy for Growth in the Norwich Policy Area", CEMEX supports commercial and residential growth within the Norwich Policy Area. CEMEX considers locating development within this area as a sustainable approach to development. Consequently, CEMEX considers Policy 2 to be in accordance with PPS1 and PPS3 which seek residential development in existing settlement, in accessible locations (PPS1, Paragraph 27 and PPS3, Paragraph 36). In particular, CEMEX urges the Council to consider their site in Norwich for residential led mixed-use development. This site is situated in an accessible location, within the Norwich Policy Area. The development of this site would accord with PPS1 (Paragraph 27 viii) and PPS3 (Paragraph 10), both of which promote commercial and residential development within existing settlements in accessible locations. In addition, this form of development would allow new employment development in a location which would serve major growth locations in all options set out in Policy 5 "Locations for Major Change and Development in the Norwich Policy Area" of the Core Strategy Preferred Options paper.	



7655	Highways Agency Policy 2 Strategy for growth in the Norwich Policy Area A range of transport infrastructure is identified as necessary for growth in the Norwich Policy Area. It is noted that new rail halts at Broadmead Business Park and Rackheath (and the possibility of new services being investigated on the Wymondham - Norwich - Wroxham axis) have been identified. These halts were not mentioned in previous LDF documents. The consultation does not state the status of these rail halts such as whether the viability of the halts have been tested and whether they have been discussed with network rail and train operators to ensure they are deliverable and sustainable. In addition the consultation document has not identified whether there are other potential locations for new rail halts such as Hethersett and Long Stratton. Policy 3 - Norwich City Centre The Highways Agency welcomes proposals to improve sustainable transport access to and within the city centre, as well as improvements for walking and cycling. A bus rapid transit system would also be welcome to link Norwich City Centre with new communities. The Highways Agency is pleased to support the commitment to provide additional dwellings in the city centre and for its status to become a focal point for office and retail development. The document does not say whether the 2,750 dwellings proposed is the maximum number that could be achieved within the city centre. Policy 4 - The remainder of the Norwich urban area, including the fringe parishes This Policy aims to reduce the impact of traffic on residential areas through the construction of the Norwich Northern Distributor Road (NNDR) and by introducing area wide traffic restraint. It is also proposed to enhance public transport. The Highways Agency supports these proposals. However, it is noted that with the regeneration of Norwich, there is a likelihood of an increased level of traffic to the city.
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7665	<p>Ifield Estates Limited We endorse the proposition in Policy 2 of the Technical Consultation to the effect that "employment development at strategic locations" will include an extension to Broadland Business Park. Such an outcome will represent a key component of the sustainable growth anticipated for the Norwich Policy Area in the East of England Plan. Norwich is a Key Centre for Development and Change and it is vitally important to ensure that appropriate/sustainable/deliverable strategic employment areas are identified in the Joint Core Strategy in order to address the policy expectations enshrined in the East of England Plan.</p> <p>An extension to the Broadland Business Park can play a role in implementing Policy 4 of the Technical Consultation which seeks to improve the gateways to Norwich by co-ordinated environmental and townscape improvements "on all major routes from the urban edge to the City Centre." Furthermore, Policy 4 describes a proposed significant enhancement of public transport, incorporating a bus rapid transport network on routes linking the City Centre to the Thorpe St Andrew business parks amongst other locations.</p>	
7711	<p>Poringland Parish Council The development of Norwich in leisure, office and culture will be dramatically hindered if the restrictive policies on traffic and transport are not revised to ensure ease of movement of staff, customers and people enjoying themselves. This means maintaining and extending affordable bus services and perhaps the provision of trams. Until such a time, the progressive clampdown on the use of cars has to be ceased. The costs of people gaining access to the City (through buses and/or parking) are very high in comparison with other comparable boroughs (Leeds Sheffield York) and are likely to hinder the development of the city as a focus.</p> <p>Policy 3 on the City Centre Questions 3 to 17 do not apply to the Five Villages, however the phrase 'traffic restraint' means putting obstructions to the use of cars and goods vehicles when wishing to access the City.</p> <p>There is a choice: either make public transport relatively cheap and convenient or to allow unfettered use of private vehicles. It is must be either because by pursuing a high cost/low convenience public transport policy this means forcing individuals to use their cars. The City serves its hinterland - the present City Council by its policies and actions appears to believe that it serves only City dwellers and the hinterland can please itself - taking Hobson's choice. We have direct public transport only to the City Centre, with none to the Longwater and Thorpe employment areas or to the Hospital.</p> <p>Policy 5 Locations for major change - the document suggests that this area is not going to be one where major change is contemplated - which we welcome.</p> <p>Policy 8 mentions Stoke Holy Cross as a separate entity to the 5 Villages. It is about time that the writers of this strategy accepted that the 5 Villages is to be treated as one entity with one guiding document, the '5 Villages Parish Plan' and should be censured for treating various areas of the conurbation as entirely separate villages.</p>	



	<p>It looks as if the writers Of this document have not been made aware of the Supplementary Planning Guidance that is likely to come about as a result of the DEFRA surface water drainage project - just how much of the existing planned housing can be built unless there is significant investment in the drainage infrastructure remains to be seen.</p>	
7713	<p>Cringleford Parish Council We note all options have 2000 houses in the Norwich fringe within South Norfolk. We see from Policy 1 that Cringleford is one of the areas identified as being suitable for more housing, From the list the only areas in South Norfolk are Colney, Costessey, Cringleford and Trowse so it must be quite likely that Cringleford could get some of these houses. If the number of houses was only 50 as suggested for many other places as in Policy 7 this may be more acceptable as there are sites that could take a small number of houses.</p> <p>Policy 7 excludes Poringland due to the existing commitments. We find this very difficult to accept as Cringleford also has significant commitments of 750+ dwellings (shortly to be proposed to rise to 1065) but are included in Policy 1 but Poringland isn't, This seems grossly unfair to our parish.</p>	
7719	<p>Kimberley & Carleton Forehoe Parish Council There should be considerably more space devoted to housing (5,000 new homes) within the City. This makes environmental and ergonomic sense - this is where the jobs are.</p>	
7757	<p>Entec UK The policy states that a minimum of 2750 dwellings will be provided within the city centre. However, as established in the Housing Market Assessment, in recent years there have been a large number of flatted developments in Norwich. The pressing need within the housing market is for larger family housing. Whilst the Strategic Housing Land Availability Assessment will provide greater detail it is questionable that there is a need and also that there are sufficient sites within Norwich City Centre to accommodate at least 2,750 units. A higher proportion of housing should be allocated in Wymondham to ensure that the minimum requirements of the RSS are met.</p>	
7813	<p>NHS Norfolk No</p>	



Q3. FOR OPTION 1 - What additional significant infrastructure requirements would there be?	
	There were 60 responses to this question.
	<p>Issues raised include sewerage, traffic, concentrating development in a new town, water and wastewater infrastructure, a new Parkway railway station, Strategic Waste Management Facilities, managing development of and links to existing infrastructure, A11 dualling and other road improvements, telephone/ broadband connections, environmental/ conservation issues, policing, railway links, new housing locations, strategic employment locations, the settlement hierarchy, development in Drayton, electrical supplies/ network, need for more detailed maps, classification of Tasburgh, maintaining Norwich's rural hinterland, satellite development at Long Stratton, development limits at Aylsham, scale of development at Colney Lane, street lighting, public transport, healthcare and leisure provision.</p> <p>Communities mentioned specifically include Hethersett, Little Melton and Wymondham, Norwich, Mangreen, Thetford, Newmarket, Cambridge, Fiveways, Costessey, Easton, Sprowston, Rackheath, Swardesdon, Mulbarton, Swainsthorpe Bowthorpe, Postwick, Cringleford, Colney, Taverham, Trowse, Hainford, Newton St Faith, Frettenham, Arminghall, Bixley CP, Framingham Pigot, Framingham Earl, Poringland, Drayton, Taverham, Horsford Manor, Longwater, Thickthorn, Tasburgh, Long Stratton, Thorpe End, Aylsham, Colney, Wroxham and Bawburgh.</p>
6801	Mrs H Williamson refers to large number of houses near and around the village of Hethersett. How can this area possibly cope when problems have arisen with sewage, narrow lanes and lack of forward planning when Wimpy started work here last year? The only possible option would have to be Option 3. Space between Little Melton and neighbours in Wymondham are and should remain farming lands.
6802	Roger Heap says 47,500 home have to be built by 2026, constituting a large town of some 125,000 inhabitants. He suggests building a new large town somewhere on the green fields of Norfolk. A new town will have the advantages of new rail and road connections to major rail networks and motorways, new schools, community centers, and a new, sewage system, together with industrial centers.
6841	Anglian Water Services Ltd refer to Water Cycle Study Stage 2A report. It would appear that Option 1 is the most readily deliverable option taking into account water and wastewater infrastructure requirements, but this should be validated by the Water Cycle Study before final selection
6898	Falcon Property Solutions say there is an opportunity for a new parkway railway station, which will provide a new hub in a superb, inter-connected public transport system, with off-road dedicated bus links, footpaths and cycleways between neighbouring existing communities, Mangreen, the new parkway railway station and Norwich City Centre. The station will also be a catalyst for economic growth and there is space to accommodate further housing and integrated employment areas well into the future.



6920	Norfolk Environmental Waste Services suggest Strategic Waste Management Facilities.	
6945	Woods Hardwick Planning say care should be taken to ensure that there are links to existing infrastructure, housing, and employment sites rather than requiring entirely new infrastructure.	
6998	Barnham Broom Parish Council say completion of the A11 dualling should be included here as not all residents to the south of Norwich will necessarily focus on Norwich, but may also require access to Thetford, Newmarket and Cambridge thereby worsening the problems between Thetford and Fiveways. Costessey Telephone exchange already has very long lines running to the newer developments, making broadband connections poor or unavailable in the Queens Hills and Longwater areas. There may be a need for a new telephone exchange closer to any more development in this area.	
7006	Natural England note that since all the options include growth in the same strategic areas, their comments for option 1 relate to all 3 options for major change, as well as to the main towns, service centres, service villages, smaller villages, the countryside and the Broads. Since all growth has the potential to negatively impact on designated sites (particularly via water availability and quality) and biodiversity in the wider environment, we do not believe that there is a notable difference to our interests between the options, although we believe that option 1's allocation of 4,000 new homes in the Wymondham area may put significant additional pressure on the natural environment in that area. As no specific areas have been identified, and the document refers only to the generality of settlements, our comments are necessarily generic. We have, however, made reference to specific designated sites as they relate to individual options. Significant infrastructure - following the findings of the Norwich Water Cycle Strategy, additional facilities for the treatment and disposal of sewage and the identification of new points for water abstraction; waste disposal; inter-connected networks of green infrastructure meeting the ANGst standards; sustainable transport options.	
7018	Easton College say delivering growth in the sub-region is likely to require a significant investment in infrastructure. However, the starting point for any strategy and development must be to manage the impact on existing infrastructure and change travel and consumption behaviours. Our proposals for Easton seek to deliver improvements in non-car facilities and access to Easton College so as to lessen the impact on existing infrastructure such as the A47. The partners are committed to delivering improved access to Easton College, improved pedestrian and cycle links between Easton and the College, improved pedestrian and cycle links to Costessey Park & Ride and implementation of a new shuttle bus linking Easton, the College and Costessey Park & Ride.	



7042	<p>Horsham & Newton St Faith Parish Council refer to the proposed new business park associated with the Airport and focused on airport related uses as set out in Policy 2 of the consultation document. In principle we fully support this proposal, which is a feature of all three options. The additional infrastructure required to implement the proposal comprises a new access road and junction with A140 and then the usual on-site infrastructure of roads, foul and surface water sewers, water, gas, electricity and telecommunications. Scott Wilson has prepared an Access and Drainage Strategy report, including plans of the site. An environmental scoping study will be commissioned to provide an objective appraisal of the environmental issues and potential impacts associated with the potential development of the land for a business park.</p>	
7053	<p>Norfolk Constabulary say all development will require an increase in Police resources. Norfolk Constabulary objects to the current details of significant infrastructure requirements. The scale of development envisaged in the specified areas will have a significant impact on police resources. See response to question 1. The main direct areas of impact relate to increasing the size of Safer Neighbourhood Teams and enhancing Response and Protective Police Services. (Examples of Protective services are Adult and Children Protection and Domestic Violence Units). Other ancillary impacts will be on levels and investigation of serious crime, custody capacity and Norfolk Constabulary's support services. Norfolk Constabulary has serious infrastructure concerns for expanding Police Services at:</p> <ul style="list-style-type: none"> • North East (Sprowston & Rackheath) As Sprowston Police Station on Wroxham Road, Norwich is too small to expand and has temporary buildings on site. New Police premises provision is likely to be required. • South West – (Hethersett/Little Melton) If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team. • South (Mangreen/Swardesdon/Mulbarton/Swainsthorpe area) - If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team. • Wymondham - If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team. Please note Norfolk Constabulary objected to the Pelham Holdings Application for 3,000 dwellings on the south side of Wymondham. • West (Costessey/Easton area) - As Bowthorpe Police Station at Wendene, Bowthorpe, Norwich is too small to expand and has temporary portakabins on site. 	
7083	<p>Hevingham Parish Council None, but those identified should be in place before any major development</p>	



7117	<p>Thorpe and Felthorpe Trust Our clients and adjoining landowners acknowledge the need for new infrastructure to support the growth of the city, including those identified by the Council, which relate to the need for new transport, social and utility/service infrastructure. The delivery of such infrastructure requires the coordination of a range of public sector organisations and the private sector. This is further discussed in our responses to questions 4, 9 and 14 below.</p> <p>Our client's landholdings are adjacent to the agreed route for the Norwich Northern Distributor Road (NNDR). It is acknowledged that the NNDR is a significant piece of the Norwich Area Transport Strategy and will play an important part in supporting major growth. However, it is considered that there are a number of other initiatives that would provide significant improvements to the local transport network and support increased growth in this area. The North East Sector offers the best opportunity to utilise the existing capacity on the underused Bittern Line (the Norwich-Sheringham railway line). The insertion of a rail halt within a new urban extension, linking with the proposed Eco settlement at Rackheath would create a new local rail transit and public transport interchange, linked to the centre of Norwich. This would act to increase transport choice and promote more sustainable modes of transport. It would also increase connectivity to and from existing communities as well as supporting future communities.</p>	
7134	<p>Savills All the major growth locations identified will involve significant investment in infrastructure. In relation to Option 1 we consider that given the likely level of investment in infrastructure the Core Strategy should seek to maximise the amount of development to the North East in order to support that infrastructure and utilise the capacity created. Maximising growth to the North East may also assist in the investigation of further options for sustainable infrastructure, such as the potential for the urban extension to be served by rail services.</p> <p>In planning for major growth to the North East of Norwich we consider that the strategy should identify the overall scale of development to be delivered, including beyond the plan period. This will assist with planning and delivering the infrastructure to ensure that North East Norwich functions as an integrated and sustainable urban extension. The options in the Appendices identify the overall scale of development, but this is not included within the Spatial Vision nor the proposed Core policies. We suggest that both the Spatial Vision and the Core policies should make reference to growth in this location of at least 10,000 homes, of which 6,000 are to be delivered by 2026.</p> <p>We also consider that the Core Strategy should clarify the intentions regarding growth within the NNDR and at Rackheath. We consider that there is scope for a mixed use urban extension of at least 6,000 homes within the area bounded by Wroxham Road, the proposed NNDR and A47 at Postwick over the longer term.</p>	



7152	<p>Norwich Consolidated Charities Our clients were concerned at the emphasis placed in the Issues and Options Consultation Report of November 2007 upon the provision of secondary education as the primary means by which to establish the scale and location of new development areas around Norwich. The general approach described at paragraphs 5.10-5.24 of the Consultation Report represented an inflexible and short-sighted view of the approach to be adopted regarding the identification of planned urban extensions. We consider that the distribution of urban extensions should recognise that new development areas can be added to existing neighbourhoods, thereby creating the scale of development needed to support a secondary school or other strategic infrastructure.</p> <p>New housing locations</p> <p>Our clients welcome the comment at paragraph 1.10 of the Technical Consultation that "to deliver the planned housing growth large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area, is proposed." The Technical Consultation recognises the possibility of utilising planned urban extensions of a more moderate scale than that proposed in the earlier Consultation Report, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich.</p> <p>The achievement of the necessary housing and employment delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. It is vital to confirm that the proposed new development areas are integrated with the existing built-up area of Norwich, not physically/socially divorced from it. The new development areas must exhibit a strong degree of interaction with the existing urban area if the objectives enshrined in Policy NR1 of the East of England Plan are to be fulfilled.</p> <p>We do not consider that it will be possible to bring forward larger-scale development areas quickly. Given that proposition, it is entirely appropriate for the Technical Consultation to recognise that the delivery of the growth agenda must incorporate a mixture of large scale and small/medium scale development locations, dispersed around the Norwich area in suitable/sustainable locations.</p> <p>Our clients acknowledge the change in emphasis between the Issues and Options Consultation Report and the present Technical Consultation as effectively described at paragraph 1.10 of the Technical Consultation. Given that context, they endorse Policies 1, 2, 4 and 5 of the Technical Consultation as, in combination, they provide a policy framework/spatial strategy capable of delivering the objective enshrined in paragraph 1.10 of</p>
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the present Consultation.

Strategic employment locations

We agree with the observation in Policy 2 of the Consultation that the focus for major growth and development will be the Norwich Policy Area as defined in Appendix four. Our clients equally support the proposition that further employment development is envisaged at strategic locations, including Cringleford/Colney.

The Spatial Vision within the Technical Consultation acknowledges that significant change will arise in the area covered by the Joint Core Strategy in order to accommodate the requirements for new homes and jobs established in the East of England Plan. The Vision anticipates investment at strategic and other employment locations, including Cringleford/Colney, which will help create a stronger economy. Furthermore, Objective 5 acknowledges that sufficient land for employment development will be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. Objective 5 states that Cringleford/Colney will be a focus of further employment growth in the Norwich Policy Area.

Policy 1 of the Technical Consultation contains a settlement hierarchy which describes Cringleford and Colney as being part of the wider Norwich urban area. Policy 2, outlining the strategy for growth in the Norwich Policy Area, expects a significant expansion of employment opportunities in the general UEA/NRP area. Policy 2 of the Technical Consultation also anticipates at least 2,000 dwellings on small/medium sites in sustainable locations in the Norwich urban area as defined in Policy 1.

Paragraph 7.5 of the Technical Consultation states that the existing suburbs and immediate urban/rural fringe "are a key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the links between the city centre and the surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated strategy." Policy 4 notes that opportunities will be sought throughout the suburban area to improve "the gateways to Norwich by seeking co-ordinated environmental and townscape improvements on all major routes from the urban edge to the City Centre." Furthermore, Policy 4 notes that the planned enhancement of public transport will incorporate a bus rapid transit network on routes linking the City Centre to certain locations, including Cringleford/NRP.

Our clients endorse the spatial planning approach envisaged in Policy 1, Policy 2, Policy 4 and paragraph 7.5 of the Technical Consultation. When the spatial elements outlined are combined, a sustainable policy outcome would be the identification of a gateway development off Newmarket Road, to the east of the Thickthorn Interchange. The A11 is the most significant strategic gateway into Norwich and should be the location of a high quality business park/housing development area, forming a logical extension of the employment opportunities off Colney Lane and the new housing off Round House Way. The junction between the A11 and the A47 constitutes a clear strategic hub and the land either side of Newmarket Road should form part of the spatial strategic framework for the Norwich area, enabling the gateway concept described in Policy 4 of the Technical Consultation to be effected.



Policy 4 also notes that "green infrastructure and links between currently fragmented habitats and to the rural fringe will be protected, maintained and enhanced." This will include, inter alia, the completion of a riverside and river valley walks "extending out into the surrounding countryside." Our clients own land in the Yare Valley off Keswick Road/The Loke and in the vicinity of Cringleford Wood/Gurney Lane. These areas could form part of the wider green infrastructure anticipated in Policy 4, brought forward as part of the wider Newmarket Road Gateway. In this way, a comprehensive strategy can be delivered in the Cringleford area to improve this strategically significant gateway to Norwich whilst enhancing green infrastructure, two key components of Policy 4 of the Technical Consultation.

Paragraph 13.65 of the East of England Plan acknowledges that road and rail links with Norwich are improving, "particularly on the A11 corridor." Paragraph 13.67 of the EEP notes that the Norwich area's economic strengths include a diverse economic base and it is stated that "there are opportunities to build on existing strengths", with Norwich being able to benefit from its status as a major economic driver for a significant area of the Region. The EEP, at paragraph 13.69, refers to green infrastructure as a key delivery issue. The package of proposals advanced by our clients in connection with their vision of a Norwich Gateway will clearly deliver/implement policy positions/expectations established in the East of England Plan.

LOCATIONS FOR MAJOR CHANGE AND DEVELOPMENT IN THE NORWICH POLICY AREA

Settlement Hierarchy

We agree with Policy 1 of the Technical Consultation and the fact that it is envisaged that much of the new development will be focused on the urban area of Norwich, including urban fringe parishes such as Cringleford and Colney. We endorse the proposition within Policy 1 that the scale of development will decrease at each level of the proposed settlement hierarchy.

Policy approach

The allocation and delivery of the proposed larger/strategic development areas anticipated in Policy 5 of the Technical Consultation will encompass a number of years. That being the case, it is important to ensure that the Joint Core Strategy sets out a policy framework which ensures that economic growth is facilitated and an adequate supply of housing land is maintained in the NPA, in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the NPA, the housing land supply in the short/medium term cannot be achieved purely by means of the development of previously developed land or by placing an unrealistic reliance on the delivery of a limited number of strategic urban extensions. A number of medium-size development areas, at the very edge of Norwich, should be brought forward to accommodate new housing and employment opportunities in the short/medium term to ensure that the growth agenda for Norwich is not compromised in its initial phase.

The extension of the new housing and employment areas broadly off



Newmarket Road would be appropriate and achievable/deliverable in the short/medium term, thereby ensuring that the momentum for the Norwich growth area is achieved in an expeditious manner. Our clients' proposals for a Norwich Gateway can represent a key element in the early delivery of the wider spatial strategy for the Norwich area anticipated in the East of England Plan. The availability of land either side of Newmarket Road, in such a strategic location, constitutes an important factor when considering the key issues of the delivery of housing and employment opportunities in support of Policy NR1 of the East of England Plan. Its early release would be a significant building block in the initial implementation of the growth agenda.

Given the policy context, we agree with the observation at paragraph 7.5 of the Technical Consultation that the existing suburbs are a key to the successful development of the Norwich area. They provide the link between the city centre and the surrounding area and the range of issues warrants a comprehensive and dedicated strategy. A recognition of the strategic importance/significance of the Newmarket Road corridor would enable the delivery of a high quality Norwich Gateway, providing the opportunity to enhance the A11 approach to Norwich from the Southern Bypass. A development of this nature will enable significant improvements to be secured in public transport, walking and cycling links, an outcome required by Policy 4 of the Technical Consultation. The park and ride service along Newmarket Road is particularly successful and we note that Policy 4 envisages a significant enhancement of public transport in the NPA which will include, inter alia, routes linking the City Centre to Cringleford/Norwich Research Park.

Development Locations in the NPA

The achievement of the required sustainable spatial strategy will arise via a combination of sites/locations, taking forward the comment at paragraph 1.10 of the Technical Consultation. We endorse the observation at paragraph 8.1 of the Consultation which states that "sustainable neighbourhoods are a key element of the Vision for this strategy to 2026." When considered in the light of the spatial background, we agree with Policy 5 of the Consultation which requires all growth locations to achieve a high level of self containment "while integrating well with neighbouring communities." The promotion of the concept of the Norwich Gateway through the JCS will achieve the delivery of important strategic objectives described in Policies 2, 4 and 5 of the Technical Consultation.

The Spatial Vision, Policy 2 and Policy 4 refer to the strategic employment location at Colney/Cringleford and the anticipated enhancement of public transport provision between the City Centre and Cringleford/NRP. Given these important elements of the emerging strategy, we consider that Options 1 and 2 within Policy 5 would secure a distribution of new housing which reflects the spread of strategic employment areas described in Policy NR1 of the East of England Plan and the transportation enhancements foreshadowed in Policy 4 of the present Consultation. Furthermore, development in accordance with Options 1 and 2 would provide the opportunity to secure enhanced gateways to Norwich as required by Policy 4 of the Technical Consultation. The concept of the Norwich Gateway on the A11 corridor should form a strategically significant part of the delivery of the spatial policy framework for the Norwich Policy Area.



Our clients have noted that the Growth options described in Appendices one-three in the Technical Consultation do not envisage the identification of a growth area on the A11 corridor between the City Centre and the Southern Bypass. We consider that a significant opportunity exists at Cringleford to respond in a positive/sustainable manner to the issues raised in the Technical Consultation and that the concept of the Norwich Gateway can arise either in the context of a strategic growth location to the east of the Southern Bypass or in the form of a more limited urban extension, drawing upon that element of Policy 5 of the Technical Consultation which anticipates the construction of 2,000 dwellings on the "South Norfolk smaller sites."

It is important for the Joint Core Strategy to devise a framework which will enable the required degree of economic change to arise in the most effective manner. Whilst it is important to safeguard existing employment sites, it is equally necessary to allocate sufficient quantities of employment land of the appropriate quality and in the right locations to meet the needs of inward investment, new businesses and existing firms wishing to expand or relocate. Norwich City Centre will continue to exert a powerful economic influence over the Norwich Policy Area but significant locations at the edge of the City, such as the general area of the proposed Norwich Gateway, will increasingly be required to facilitate the enhancement of the local economy.

The quality of land to meet the needs of business is one of the critical factors in ensuring economic success and attracting inward investment. The Joint Core Strategy must ensure that there is a high quality offer of employment land to underpin the growth status of the Norwich area. In that wider context, we agree with the Technical Consultation which notes that locations such as Cringleford/Colney will be the focus of further employment growth.

Policy 15 of the Technical Consultation requires that sufficient employment land be allocated in locations consistent with the "Spatial Hierarchy policy to meet identified need and provide for choice." The Norwich Gateway approach proposed by our clients will contribute to the provision of a choice and range of sites. The Gateway concept supports the outcomes described at paragraphs 8.12-8.14 of the Consultation.

Draft Economic Strategy

The GNDP's Consultation on the Draft Economic Strategy acknowledges that, in terms of economic scale, Norwich is the largest economy in the Region. Greater Norwich is recognised in the Regional Economic Strategy as one of the Region's seven 'engines of growth' that will greatly contribute to the development of the wider regional economy. Our clients support the Draft Vision within the emerging Economic Strategy which states that Greater Norwich "will be recognised as a premier UK city region with a thriving, diverse and sustainable economy, providing all its citizens with opportunities and a great quality of life. The significant growth over the period to 2026 will be planned and managed so that all our neighbourhoods and communities will be sustainable, prosperous, equitable, safe, healthy and green." In order to ensure that the area's economy is strengthened, our clients consider that the Joint Core Strategy should acknowledge the positive contribution that the proposed Norwich Gateway can make to the implementation of the Draft Vision contained within the Draft Economic Strategy.

Norwich Gateway: Technical Aspects



	<p>A strategic employment proposal on Newmarket Road, combined with some further housing, would represent an appropriate response to the strategic location of this general area, adjoining the interchange between the A11 and the A47. The employment aspect of the Norwich Gateway proposal would be well related to the new housing presently being developed off Round House Way. The smaller housing component of the Norwich Gateway scheme would be well related both to the existing/proposed employment areas in Cringleford/Colney and linked to the City Centre by a well-established public transport link from the Thickthorn park and ride site along Newmarket Road.</p> <p>Appendix one of the Technical Consultation notes that the implementation of Growth option 1 requires highway improvements at the Thickthorn Interchange. One of the primary elements within Growth options 1 and 2 is reference to the significance of the primary public transport route from the south west along Newmarket Road. The Norwich Gateway proposal could be readily delivered in the context provided by the implementation of Growth options 1 and 2.</p> <p>The Norwich Gateway proposal is part of our clients' longer term investment strategy and they are committed to supporting growth in the Norwich Policy Area based upon a sustainable distribution of new employment locations to key strategic areas. Our clients would note that the plans broadly outlining Growth options 1-3 describe a strategic employment location at Cringleford/Colney, an area that could also accommodate some of the 2,000 dwellings described in Policy 5 as South Norfolk "smaller sites".</p> <p>The full potential of the Norwich Gateway proposal, incorporating employment land, new housing and green infrastructure, can be achieved by combining sites SNC0027, SNC0030 and SNC0029 described in the present Strategic Housing Land Availability Assessment Consultation.</p>	
7161	<p>Taylor Wimpey</p> <p>2.1. In their response to the Issues and Options Consultation Report in February 2008, our clients indicated their concern at the emphasis placed upon the provision of secondary education as the primary means by which to establish the scale of the proposed new urban extensions at Norwich. Taylor Wimpey Developments and Hopkins Homes considered that the general approach described at paragraphs 5.10-5.24 of the Consultation Report represented an inflexible and short-sighted view of the approach to be adopted regarding the identification of planned urban extensions. They argued that the distribution of urban extensions should recognise that new development areas can be added to existing neighbourhoods, thereby creating the scale of development needed to support a secondary school or other strategic infrastructure.</p> <p>New housing locations</p> <p>2.2. Given the reservations expressed regarding the content of the Issues and Options Consultation Report, Taylor Wimpey Developments and Hopkins Homes welcome the comment at paragraph 1.10 of the Technical Consultation that "to deliver the planned housing growth large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area, is proposed." The Technical</p>	



Consultation recognises the possibility of utilising planned urban extensions of a more moderate scale than that proposed in the earlier Consultation Report, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich.

2.3. The achievement of the necessary housing delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. Not only is it important to ensure that new housing is supported by essential community facilities/infrastructure but it is also equally vital to confirm that the proposed urban extensions are integrated with the existing built-up area of Norwich, not physically/socially divorced from it. The new development areas must exhibit a strong degree of interaction with the existing urban area if the objectives enshrined in Policy NR1 of the East of England Plan are to be fulfilled.

2.4. Taylor Wimpey Developments and Hopkins Homes do not consider that it would be possible to bring forward larger-scale development areas quickly. Given that proposition, it is entirely appropriate for the Technical Consultation to recognise that the delivery of the growth agenda must incorporate a mixture of large scale and small/medium scale development locations, dispersed around the Norwich area in suitable/sustainable locations.

2.5. Our clients acknowledge the change in emphasis between the Issues and Options Consultation Report and the present Technical Consultation as effectively described at paragraph 1.10 of the Technical Consultation. Given that context, they endorse Policies 1, 2, 4 and 5 of the Technical Consultation as, in combination, they provide a policy framework/spatial strategy capable of delivering the objective enshrined in paragraph 1.10 of the present Consultation.

Strategic employment locations

2.6. We agree with the observation in Policy 2 of the Consultation that the focus for major growth and development will be the Norwich Policy Area as defined in Appendix four. Our clients equally support the proposition that further employment development is envisaged at strategic locations, including the consolidation of activity at Longwater.

2.7. It is clear that the West Sector broadly described in Appendix one is extremely well related to the strategic employment area at Longwater and the employment opportunities at Bowthorpe. It is equally relatively close to the Norwich Research Park and adjoins the Sainsbury superstore and related retail facilities. The proposed Lodge Farm extension is served by a public transport corridor and is well located relative to the A47. Given the general intention of the Joint Core Strategy to seek a closer relationship



	<p>between new housing, jobs and services, we would suggest that the West Sector as described in Appendices one-three provides strong support for the proposition that new housing be provided off Dereham Road, as an extension of the existing Lodge Farm development.</p> <p>2.8. We have noted that the Longwater strategic employment location is shown on the plans within Growth options 1, 2 and 3. This part of the West Sector exhibits strong sustainability credentials. As acknowledged at paragraph 1.10 of the Technical Consultation, medium-size urban extensions, such as the proposal regarding land to the west of the existing Lodge Farm development, can play a vitally important role in the short/medium term to generate the required initial momentum for the Norwich growth area.</p> <p>2.9. We concur with the observation within the spatial vision at page 17 of the Technical Consultation that investment at strategic and other employment locations "will have helped create a stronger economy." One of the areas identified therein for jobs growth is Longwater.</p> <p>Settlement hierarchy</p> <p>2.10. We agree with Policy 1 of the Technical Consultation and the fact that it is envisaged that much of the new development will be focused on the urban area of Norwich, including urban fringe parishes such as Costessey. We endorse the proposition within Policy 1 that the scale of development will decrease at each level of the proposed settlement hierarchy.</p> <p>2.11. We agree with the observation at paragraph 7.5 of the Technical Consultation that the existing suburbs and immediate urban/rural fringe "are a key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the links between the city centre and the surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated strategy." In the context of the West Sector described in Appendices one-three, an extension of the existing Lodge Farm development area would enable elements of Policy 4 of the Technical Consultation to be addressed. For example, the extension of the Lodge Farm site, in conjunction with improvements to the A47 Longwater interchange, provides the opportunity to enhance the Dereham Road gateway to Norwich.</p> <p>2.12. The enlargement of the present Lodge Farm development will enable significant improvements to be secured in public transport, walking and cycling links, an outcome required by Policy 4 of the Technical Consultation. Specific reference is made within that Policy to a significant enhancement of public transport on routes linking the City Centre to locations such as Bowthorpe/Costessey/Longwater.</p>	
7207	<p>Salhouse Parish Council Bus services - inadequate at present. Roads - inadequate at present. Cycle paths - inadequate at present. Rail stops - inadequate at present. Sewage and drainage - inadequate at present. Hi-speed internet - inadequate at present.</p>	



7228	<p>Bidwells Drayton Farms Ltd - a subsidiary of RG Carter Ltd - wishes to promote its landholding off Reepham Road/School Road as a potential site for employment land. I attach drawing number NJP 08 347-01 indicating the land.</p> <p>This site, which is approximately 21 hectares in area, has previously been promoted (2006) as part of a larger mixed-use development site to Broadland District Council for potential B1/B2 uses, although not through any official LDF consultation process.</p> <p>In the Spatial Vision, Drayton Farms Ltd welcomes the fact that 33,000 new jobs will be created in Broadland, Norwich and South Norfolk as a whole between 2006 and 2026. It is acknowledged that further investment at strategic and other employment locations will be needed to support and create a sustainable, diverse and thriving economy. Drayton Farms Ltd. also supports recognition of the importance of the Northern Norwich Distributor Route (NDR) in supporting the employment growth.</p> <p>In Policy 1, Drayton Farms Ltd welcomes the inclusion of the parish of Drayton in the urban area of Norwich.</p> <p>In Policy 15, Drayton Farms Ltd supports the need for sufficient employment land to be identified to meet need (35,000 additional jobs in the period 2001-21) and provide for choice, with small and start-up businesses and larger scale business needs all catered for to ensure the provision of a choice and range of sites. However, whilst it is important for growth in key employment sites - such as the Broadland Business Park and Longwater Employment Area - to be supported, there is a need for a range of other new or expanded employment land sites identified to ensure that employment sites can be located close to centres of population such as Thorpe Marriott, Drayton and Taverham.</p> <p>Drayton Farms Ltd welcomes the support in Policies 2 and 16 for the inclusion of the Norwich Northern Distributor Route "to unlock growth and improve surface access to Norwich Airport" (para. 8.18) It is clear that the NDR will play a vital role in improving strategic transport movements in and around the north of Norwich, and thus help provide some re-balancing to the considerable employment land growth at Broadland Business Park and the A11 corridor to the south of Norwich in recent years.</p>	
7250	Les Brown Associates Should include Trowse	
7276	<p>Bidwells (Harts Farm) Ltd contend that a commercial led mixed use development scheme at East Wymondham (Browick Road) can be delivered within existing infrastructure capacity. Evidence gathered as part of earlier planning proposals in the area (NJP planning application) demonstrates that sufficient infrastructure capacity already exists or can be delivered, to accommodate growth at East Wymondham. In particular, previous evidence accepted by South Norfolk Council in granting permission for the NJP scheme at Browick Road demonstrates that the existing junction onto the A1 has sufficient capacity to accommodate more traffic movements. South Norfolk Council is already aware of this evidence, so it is not re-submitted alongside this representation.</p>	



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7296	Breckland District Council The impact of 4,000 homes at Wymondham, 4,000 at Hethersett and 2,000 at Costessey/Easton may require additional electrical network upgrades to ensure continuity of supply to these locations and wider locations such as Attleborough and Dereham which are dependent on supply from the Trowse supergrid station. Question 4: Constraints on delivery could include energy (principally electricity supplies) and road capacity on the A11 and A47, especially at Longwater and Thickthorn. The capacity of rail to serve expanded communities at Wymondham and beyond is questioned.	
7303	Bidwells Northumberland Street sits within the Waterworks Road Industrial Estate, a small estate located between Heigham Street and Dereham Road. It is identified as an employment Area (EMP 5.5) in the adopted Norwich City Local Plan. Appendix 1 of the Greater Norwich Employment Growth and Sites & Premises Study ("the Study") notes that the Estate, which has a site area of approximately 4.2 ha, contains approximately 6600m ² of floorspace with an office:industrial split of broadly 10%:90%. The Study finds that the age of the buildings ranges from the 1950s to 1990s, with some of the older buildings in fairly poor condition. Car parking surfaces are also found generally to be in a fairly poor condition. The site adjoins residential areas and, in more recent years, a number of nearby buildings have been converted to residential use, including commercial units and a pub. The most recent manifestation of this is the former Wensum Clothing factory, which was granted planning permission (subject to the signing of a S106 agreement) for conversion to 54 residential units and 418m ² of office space in April 2008. The problems Northumberland Street suffers from a number of disadvantages as an employment area, particularly for industrial/commercial operations. The industrial estate is poorly-located in relation to the arterial road network - to access the A47 and the trunk road network requires negotiating the Outer Ring Road and then Dereham Road as well as Northumberland Street itself. The estate therefore compares poorly with more modern industrial estates elsewhere in the Norwich area, such as the Broadland Business Park and Longwater Employment Area. As noted above, it is located in a largely residential area, and the residential footprint has expanded over recent years. Nelson First School is also located on the road, a very short distance from the employment area. Parking and access are therefore causing serious difficulties for Eastern Storage Equipment Ltd's own operations, and also to those of their business tenants. It is becoming increasingly difficult to navigate articulated lorries and large delivery vehicles down the Northumberland Street, which is usually full of parked vehicles throughout the day, particularly around the times the school starts and finishes. On occasions Eastern Storage Equipment Ltd has to stop traffic on the road and unload from the roadside, and they also sometimes	



had to send delivery vehicles away to return on smaller vehicles, delaying delivery to customers and losing the company business. A former tenant of Eastern Storage Equipment Ltd's moved out of their premises earlier in the decade because some of their suppliers could not get their articulated lorries close enough to unload and other suppliers charged extra fees because of having to use smaller vehicles to negotiate the roads around the site.

The increasingly residential nature of Northumberland Street has not been lost on potential occupiers of industrial/commercial space in the Norwich area. Many modern occupiers are reluctant to locate in such areas for neighbourly reasons, because it may well have a negative effect on the smooth running of their businesses.

Finally, the age and nature of many of the buildings in the Estate are simply not fit-for-purpose for many modern industrial companies, who seek flexible space in a lower density site - the Estate has a density of over 70%, compared to a more desirable 30-45% on modern business parks and industrial estates.

The future

The Study, in paragraph 11.8, concludes that whilst the industrial estate is suitable for further employment development, this needs to take account of the residential context of the area and that it is likely to be under pressure for further residential development. Small businesses units or a small office park are suggested, but the lack of prominence and poor access are noted as constraints.

Eastern Storage Equipment's land is included as part of a wider site which has been assessed in the emerging SHLAA. The SHLAA commentary on access/safety identifies a number of potential benefits should the wider site be converted to residential use: Provides a net gain to the highway, e.g. removes existing source of danger; improvement to safety; significant opportunity to encourage sustainable travel; beneficial change in traffic type or patterns of movement; reduction in congestion. A motor spares/scrapyard site on the other side of Northumberland Street is also identified in the SHLAA, with the same access/safety benefits; this site forms an existing Local Plan allocation (HOU12 B28) for 30 dwellings.

Norwich City Council officers appear to accept that the Estate is no longer an appropriate location for industrial employment. Commenting on the planning application for the conversion of the Wensum Clothing Factory in March 2008, Policy Officer Rob Hobbs commented: "It is recognised that smaller-scale local job opportunities are more likely to arise in office-based employment and other service sectors...larger scale industry and warehousing is something that the Local Plan would not wish to encourage, or perpetuate, given the proximity of neighbouring residential uses in the Northumberland Street area".

Eastern Storage Equipment Ltd shares this view, and contends that the poor access to the industrial estate is, in the context of its location in a largely residential area distant from the arterial road network, a very considerable disadvantage. Whilst it is accepted that there is limited employment land capacity within Norwich City, Eastern Storage Equipment Ltd is of the opinion that increasing pressure for residential development in this location



	<p>should not generally be resisted, although the potential and suitability for some limited conversions to office development is recognised.</p> <p>In further support of this view, Paragraph 44 of PPS3 invites Local Planning Authorities to consider whether existing commercial/industrial sites could be more appropriately re-allocated for housing development. Paragraph 25 of draft PPS4 also asks LPAs to "use a range of evidence to assess the most efficient and effective use of land...including the use of market signals. [They should ensure that] the overall land supply is sufficient so that there is the right potential for both employment and residential use".</p> <p>Conclusion</p> <p>In conclusion, Eastern Storage Equipment Ltd does not believe that the Northumberland Street/Waterworks Road Industrial Estate should be retained as a largely commercial/industrial estate. The market signals in recent years have been clear: given the increasingly residential nature of the area, the Estate is no longer an appropriate location for industrial and commercial employment buildings. Such operations are much better sited away from residential areas and close to arterial roads and the trunk road network. The Joint Core Strategy and emerging Site Allocations DPDs should therefore take the chance to identify more suitable sites for industrial/commercial development and allow the conversion of the Estate to residential use (perhaps also with some B1 office development), thus making best use of brownfield land which is well-related to the city centre with excellent public transport links and the adjacent primary/first school.</p> <p>Changes to the SHLAA analysis requested</p> <p>Although Eastern Storage Equipment Ltd's site forms only part of the larger SHLAA site (and thus these comments are not made on behalf of the other landowners), Eastern Storage Equipment Ltd requests that the following changes are made in relation to their site: the site would be available quickly (within the next few years), and thus its release phase should be categorised as Within Five Years.</p>	
<p>7316</p>	<p>Norwich Green Party 14. We are grateful that in the Technical Consultation at least two of the ten original proposed areas (ie Area 1: Hainford, Newton St Faith, Frettenham and Area 4: Arminghall, Bixley CP, Framingham Pigot, Framingham Earl, Poringland) have been spared significant development. Area 10 (Drayton, Taverham, Horsford Manor, Drayton), while not mentioned directly, does possibly appear to be partially included in the 2000 (or 3000 with Option 3) houses which are planned for the North of the city. Pressure on land for inner city development may make some sprawl into this area inevitable, in which case the Technical Consultation should be more specific as to its intentions here. This sort of uncertainty highlights the need for more accurate and detailed maps to accompany the Consultation.</p>	



7318	Norwich Green Party Wymondham. Option 1: 4000 houses. Option 2 & 3: 2000 houses. 21. Again, here, the necessity for more detailed maps is apparent as the 'issues and options' document shows development to take place south and south-west of the town, while the Technical Consultation describes planned growth 'predominantly to the south and east of the town'. To the south-west of the town, is the Bay River valley currently protected under ENV13 as a 'Site of regional and local nature conservation interest' and flood risk zone. This, with an adequately proportioned buffer zone, would, one hopes, act as a barrier to westward expansion of development if it occurs as envisaged in the Technical Consultation 22. The recent application for 3000 homes by Pelham Holdings for land south of the town shows the kind of issues any development here would be confronted with. Natural England, for instance, launched a strong objection to the proposals pointing them out to be in contravention of the Natural Environment and Rural Communities Act (2006) which, of course, would still take precedence over any new local planning policy. They viewed the development here as being a serious threat to biodiversity, or more specifically, to bats, water voles, otters and great newts in the immediate area. Seven County Wildlife sites are within or close to the development boundary including Silfield Nature Reserve. They also state that 'Of particular concern is the loss of species-rich wet meadows, semi-natural woodland and Important Hedgerows, and the consequent fragmentation and isolation of valuable pockets of habitat across the application site, which will be surrounded by development.' 23. Wymondham itself is, of course, an historic market town with its own unique heritage and identity. Development even on the scale proposed in options 2 and 3 would do much to erode the character of the town of which its residents have shown a strong desire to protect. A recent consultation exercise by Wymondham Town Council found that resisting further major development was a key priority of those that took part. It was also widely felt that improvement to services and infrastructure should come ahead of any development and that protection of the natural environment was of prime importance. The Town Council itself has committed to 'protect Wymondham's cultural and historic heritage' and, while favouring the provision of more affordable and special needs homes, foresees the securing of additional housing through small scale development only. 24. The other difficulty of development to the south of the town is the dividing effect of the railway line which would make it hard to integrate new housing with the rest of the community and thus further dilute the town's identity.	
7321	Norwich Green Party Hethersett and Little Melton. Option 1 and 2: 4000 houses. 25. The area loosely specified in the Technical Consultation appears to extend not as far south as originally shown in 'issues and options' but covers the areas to the north and east of Hethersett encompassing Little Melton. We would concur with some residents' requests that more precise plans are	



	<p>needed to fully assess the proposals.</p> <p>26. We note that much of this area is currently protected under ENV2 which provides for green wedges and forbids 'inappropriate development' which 'would be detrimental to the rural character of the area'. It is precisely that character and the separate identity of the villages which would, of course, be lost with these proposals and which local residents have shown such desire to protect. In the current Local Plan, there is also a strong presumption against development in the Western area of the site as is it is deemed vital to maintain the landscape setting of the southern bypass (A47) and to prevent the road being a focus for outward development of the city.</p> <p>27. Right in the middle of the proposed area is a site of local nature conservation interest consisting of 'Braymeadow Bottom' and a succession of small lakes. There is also a County Wildlife Site along the watercourse to the west of Little Melton (south of Low Common) well within the proposed development area. Fragmentation of the surrounding natural environment would, of course, be a threat to their biodiversity. Church Plantation (lying between 2 sites of ancient ruins) and the grounds of Thickthorn Hall, both historic parkland consisting of mixed woods, are on its west and south edges respectively. Large scale development as proposed would be completely detrimental to the setting and damaging to the habitat value of these areas.</p> <p>28. Questions also have to be raised about pressure on the road network particularly given its proximity to the city and the likelihood, for instance, of new roads being used as 'rat runs'. The B1108, already congested to capacity and vital for access to the hospital from the city, would form one of the main routes into town for the new settlement. Concerns have also been raised that the Thickthorn roundabout, which has been described by officers in reports contributing to the strategy as having 'limited or no capacity', would also experience significantly increased traffic.</p>	
7326	Norwich Green Party West': Costessey & Easton, Options 1 & 2: 2000 homes. Option 3: 1000 homes. 35. This largely appears to include land bounded by Bowthorpe to the east and the A47 to the west. Some of this has already been designated for housing growth to which we have no objection but the south of the area appears unsuitable for development being both part of the Bypass Landscape Protection Zone and the Yare Valley. Present policy clearly and place-specifically precludes development here and we would question why it has been considered as an option. Other areas in the North and West of the area at present form part of the 'green wedge'. Woodland immediately to the north of the Dereham Road and the A47 to the West with its attendant protection zone would appear to act as further barriers to development. The protection zone has, for the last 15 years, served the role as defined by the Structure Plan Panel of preserving 'those attributes of the City's natural setting which contribute to its environmental quality'. It is important that this laudable aim is not overridden.	



	36. Although road transport links are good for this site it is important to note it is some distance from railway access.	
7340	Stratton Strawless Parish Council We are unable to answer any more questions as the questions are asked of the areas and providers where developments are likely to take place	
7342	<p>Tasburgh Parish Council The following is Tasburgh Parish Council's response to the above document:</p> <p>Of the three options detailed on page 8, Tasburgh Parish Council would favour option 1 for two reasons:</p> <p>It has no development for Long Stratton.</p> <p>A development in Long Stratton of between 1500 and 2000 homes would have an adverse effect on the character of the surrounding rural area.</p> <ul style="list-style-type: none"> • The infrastructure of Long Stratton is already at capacity. • There are serious fears that, even with this scale of development in Long Stratton, a by-pass may still not happen. Development without a by-pass would be totally inappropriate. • Even if a by-pass was to be built the remainder & the A140 is of two-way road. It places more development in Wymondham. • Wymondham seems to be well placed to take this kind of large scale development. It sits on a dual carriageway road and the bus and train links are good. <p>If there was to be large scale development in Long Stratton then:</p> <ul style="list-style-type: none"> • There must be a by-pass. • The effects on the other junctions onto the A140 need to be considered and action taken. For Tasburgh this would be the Church Road/A140 junction, Tasburgh Road (Saxlingham Thorpe)/A140 junction and the Hempnall crossroads. • There needs to be cycle and footpath access from Tasburgh to Long Stratton. • There needs to be improvement to the infrastructure of Long Stratton i.e. Heath Centre, Leisure Centre, Village Hall, Schools. <p>Tasburgh Parish Council does not agree with Tasburgh's categorisation as a 'Service Village' and believes that it should sit in the 'Other Village' category. The justification given for 'Service Village' includes 'food shop'. The only shop in Tasburgh is part of the post office in the front room of a bungalow. The Postmaster has already stated that if the Post Office was to close (it narrowly escaped the latest round of closures) then the food shop would not be viable.</p> <p>There are two further points Tasburgh Parish Council would like to make with regard to the policy.</p> <ul style="list-style-type: none"> • The development of the Hethel Engineering site: this site sits in an area of poor transport links; it is inaccessible by foot, bus or train. The roads leading to the site are rural and it encourages commuting through small villages such as Tasburgh. 	



	<ul style="list-style-type: none"> • Surprise was expressed at the fact that the capacity of the sewage treatment works at Alysham was such an insurmountable hurdle. Alysham already has a by-pass and perhaps is well placed to take development. 	
7348	<p>Mr Jim Hamshaw Surely completion of the A11 dualling should be included here as not all residents to the south of Norwich will necessarily focus on Norwich, but may also require access to Thetford, Newmarket and Cambridge thereby worsening the problems between Thetford and Fiveways.</p> <p>Costessey Telephone exchange already has very long lines running to the newer developments, making broadband connections poor or unavailable in the Queens Hills and Longwater areas. There may be a need for a new telephone exchange closer to any more development in this area.</p>	
7363	<p>I E Homes and Property Ltd Sewerage / surface water. Evidence of over capacity currently especially in Wymondham evidence by flooding.</p>	
7428	<p>Environment Agency (Eastern Area Office)</p> <p>Provision of green infrastructure forming a coherent scheme across the JCS area should be considered at an early stage. Whilst open/ green spaces can be created within development adequate links and corridors may require more strategic planning.</p> <p>An assumption has been made within stage 2 of the WCS that all sewer networks are at capacity and therefore costs and timings will need to be factored into any future growth.</p> <p>Question 4, Question 9 & Question 14</p> <p>All infrastructure should be in place in time, and where relevant operational, for development. This is as applicable for green infrastructure as for conventional infrastructure. Use of phasing will be important to enable AWS to factor any required improvement works into their business plans.</p> <p>The WCS provides information on the relative constraints of development in the locations proposed we assume that the findings of stage 1 have already been taken into account when deciding on the proposed areas for development and that stage 2a will be used to narrow down the options further.</p> <p>Within Norwich City Centre, flood risk is likely to be the greatest environmental constraint. As discussed above, a level 2a SFRA would help to assess the varying risk across the City Centre and plan around it. We would also support an interdisciplinary approach, for example allocating green spaces to areas unsuitable for built development due to high flood risk. Such an approach may help reduce food risk overall by securing or even improving the provision of floodplain within Norwich.</p>	
7452	<p>Hempnall Parish Council Hempnall Parish Council strongly objects to all three options. The amount of housing development is incompatible with maintaining a rural hinterland to Norwich, something which Hempnall Parish Council considers to be extremely valuable to the county as a whole.</p>	



7457	<p>Hethersett Parish Council Additional roads/ transport provision to enable access to the new development from existing major roads. Current minor roads not suitable for large increase in traffic. consideration should be given to some form of restriction for direct access for traffic and the potential increase in the volume of traffic through existing villages.</p>	
7498	<p>Bidwells</p> <p>In Policy 5 (questions 3-12), the locations for major change and development in the Norwich Policy Area, Option 1 or 2 is strongly preferred over Option 3. Options 1 and 2 propose 2000 new homes for Costessey and Easton but under Option 3 this is reduced to 1000. Given that the treatment of Costessey and Easton is the same for both options 1 & 2, the responses for questions 3-7 and 8-12 are considered together whilst option 3 is looked at more generally.</p> <p>Q3 , Q8</p> <p>Options 1 & 2</p> <p>Costessey is treated as part of the urban area of Norwich in the Core Strategy, and Mr Green supports this approach. Costessey has an excellent level of shops, services and employment sites, and is very well connected to the centre of Norwich through frequent bus services and a park-and-ride site. It is therefore suitable to accommodate a minimum of 2000 new dwellings in the years to 2026.</p> <p>With regard to infrastructure requirements (questions 3 and 8), although studies and consultations are ongoing, at this stage it is not anticipated that the development of this site for approximately 88 dwellings would see a significant infrastructure requirement. A Transport Statement was prepared in March 2008 and this concluded that the proposed level of development would have no significant impact on the operation of the local highway network. In addition, the site benefits from good levels of accessibility by a range of sustainable transport modes, meaning that there is significant potential for a large proportion of trips to and from the site to be made by modes other than single occupancy private car. Therefore it is not considered that there would be a need for the provision of additional transport infrastructure and further informal discussions that have taken place recently with Norfolk County Council support this view</p> <p>Work is currently ongoing with utility bodies with regard to an assessment of the capacity of existing utilities provision, although a development of approximately 88 dwellings is not anticipated to generate significant additional requirements. Consultation will shortly take place with the Primary Care Trust and Norfolk County Council with regard to the healthcare and school provision respectively but again is not considered likely to raise any significant barriers to the deliverability of this site.</p>	
7510	<p>Keymer Cavendish</p> <p>1.1 We are instructed by Valori Brothers who own a 10 hectare land parcel west of Thorpe End. However the nature of our submission tends to reflect</p>	



more the scale of our experience than the scale of our client's development land.

2.0 Background

2.1 We have been involved for more than 20 years in the strategic growth of Stevenage and have seen successes and failures along the way. A vital maxim is, where possible, to learn by others' mistakes rather than from one's own, as it tends to be cheaper!

3.0 Stevenage growth plans

3.1 A major error committed by Hertfordshire County Council and Stevenage Borough Council in the late 1990s was to select just one area of development (namely that stippled in grey on the attached plan) to the west of the town, resisting growth at other locations, until the west had been developed.

3.2 At the Structure Plan EIP in 1998, confident predictions of 500 houses per year coming on stream from West Stevenage from 2002 were endorsed by County and Borough alike, whereas Keymer Cavendish was urging the authorities not to 'put all their eggs in one basket.'

3.3 Ten years later, not one house has been built to the west of Stevenage, nor has planning consent been granted, because of the fragmentary influences of multiple ownership, minimum prices, infrastructure demands and now a falling market.

4.0 Recommendations

4.1 My recommendation, therefore, strikes at the heart of the Core Strategy, as I do not believe that any significant satellite development should be permitted at Wymondham or Long Stratton, particularly as the latter has no railway station.

4.2 It is too easy to envisage a commuter living at Wymondham working at the Broadland Business Park simply using his car every day for his journey to work, flying in the face of every sustainability target.

4.3 It is my belief that the Wroxham railway line through Sallouse and the Broadland Business Park is an ideal axis for growth and that the maximum amount of development should straddle this railway line, thus justifying significant investment in rapid transit systems using the railway lines, in addition to heavy rolling stock.

4.4 Similarly, the NOR (Northern Relief Road) would seem to offer scope for significant development within its curtilage, butting up against the existing urban fringe. Clearly crucial flood plains to the south of Norwich will need to remain undeveloped.

4.5 Additionally, my strategy casts doubt on the advisability of strategic development outside the southern bypass at Mangreen and in the Heathersett area and urges a focus on multiple locations around the urban fringe.

5.0 Strategic Land Delivery



	<p>5.1 The processes in assembling diverse land ownership for strategic development are well known and fraught with difficulty. As is often stated by the development industry, "the difficult can be done immediately, the impossible takes a little longer."</p> <p>5.2 I have long been an advocate of completing an inner eastern relief road between the A47 and the Wroxham Road in advance of the NOR because the whole of this road can be developer-funded and can be deliverable within 5-7 years.</p> <p>5.3 At present, the multi-million NOR is more of a pipe dream than a reality with an enormous gulf of unlimited capital to be found. By completing the project commenced by Broadland, namely a link from the Wroxham Road to the Salhouse Road and, from the south from the A47 to the Plumstead Road, one has 75% of an inner relief road which will perform a useful function in the short term and as an internal distributor road in the long term.</p> <p>5.4 A modest project such as this remains deliverable in a weak market and does not demand the huge funds essential to a 5,000 house strategic release.</p> <p>5.5 Referring again to Stevenage, where the failure of West Stevenage to deliver has left a huge hole in the housing trajectory, the planning authority is allowing more modest schemes of 300-400 hundred houses to come forward ahead of the formal LDF process, in order to maintain momentum while the larger sites are assembled.</p> <p>5.6 I would urge a similar strategy here.</p> <p>6.0 Detailed responses to Technical Consultation Regulation 25 To follow are our detailed responses to the technical consultation. I apologise that they are not submitted under the 32 questions raised in the response form; this is difficult to do when we feel that none of Options 1, 2 or 3 are correct.</p> <p>6.1 Page 18- Locations for major new communities We endorse the spatial vision for sustainable new communities fully equipped with shops, health, education and community services, easily accessible by foot, bicycle and public transport. We would emphasise, however, the importance of linking as many of these communities as possible to a revitalised Norwich-Wroxham railway.</p>	
<p>7514</p>	<p>Bidwells Kier Land Ltd generally welcomes the Spatial Vision as a coherent and cohesive vision for the Greater Norwich area, reinforcing the existing strengths and qualities of the area and seeking to deliver significant new housing growth in the most sustainable manner. However, as one of the four Main Towns it is unacceptable that Aylsham should effectively be frozen, with only infill growth in housing proposed.</p> <p>What is particularly troubling and disappointing to Kier Land Ltd is that the Technical Consultation document is not supported by a revised Sustainability Appraisal. There have been some significant changes to the Core Strategy since the original Issues & Options report of November 2007 (which was supported by SA): for instance, there are now three main options for major</p>	



	<p>development, and choices made in relation to the distribution and number of dwellings for smaller-scale development. It is proposed that Aylsham not be allocated any additional housing, with only infill growth permitted, yet there are no SA results to support this decision (i.e. it has not been compared with "Aylsham - 300 homes or even "Acle - 100-200 dwellings", for example).</p> <p>Kier Land Ltd has been informed that the revised SA to support the Technical Consultation will not be available until early October (i.e. after the end of the consultation period for the Technical Consultation). This is wholly unsatisfactory: paragraph 4.43 of PPS12 states that SA '.. should form an integrated part of the plan preparation process. SA should in form the evaluation of alternatives. SA should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate given reasonable alternatives" The overall soundness of the Joint Core Strategy is, even at this early stage, clearly questionable.</p> <p>The reason given for the absence of housing allocated to Aylsham is this is that there is no spare capacity at Aylsham Sewage Treatment Works to accommodate further housing growth. However, Kier Land Ltd has made a pre-development inquiry to Anglian Water Services for its site in Aylsham: AWS's response is that additional wastewater transport/ treatment capacity will be provided for sites allocated within the LDF from 2016. There are no other significant constraints to Aylsham accommodating housing growth commensurate with its Main Town status during the Plan period (to 2026). An appropriate amendment to the text should be made to say: "accommodate new housing growth that will be moderate in Aylsham (300 new homes)</p>	
7531	<p>Mr Richard Atkinson The critical infrastructure requirements have been correctly identified</p>	
7532	<p>Mr Richard Atkinson While we welcome the fact that the option identifies a strategic employment site at Colney, the option is unclear about the scale of residential development which could take place at Colney Lane and which would benefit from the education and employment opportunities available at this location and the high quality public transport links which the strategy would promote. Our investment strategy for Colney Lane is intended to maximise these benefits and could complement the proposed development at Hethersett</p>	
7552	<p>Norfolk Constabulary</p> <p>Infrastructure Requirements</p> <p>All development will require an increase in Police resources.</p> <p>Norfolk Constabulary objects to the current details of significant infrastructure requirements. The scale of development envisaged in the specified areas will have a significant impact on police resources. See response to question 1.</p> <p>The main direct areas of impact relate to increasing the size of Safer Neighbourhood Teams and enhancing Response and Protective Police Services. (Examples of Protective services are Adult and Children Protection</p>	



	<p>and Domestic Violence Units). Other ancillary impacts will be on levels and investigation of serious crime, custody capacity and Norfolk Constabulary's support services.</p> <p>Norfolk Constabulary has serious infrastructure concerns for expanding Police Services at:</p> <p>North East (Sprowston & Rackheath) As Sprowston Police Station on Wroxham Road, Norwich is too small to expand and has temporary buildings on site. New Police premises provision is likely to be required.</p> <p>South West - Hethersett/Little Melton If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>South (Mangreen/Swardesdon/Mulbarton/Swainsthorpe area) If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>Wymondham If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>Please note Norfolk Constabulary objected to the Pelham Holdings Application for 3,000 dwellings on the south side of Wymondham.</p> <p>West (Costessey/Easton area) As Bowthorpe Police Station at Wendene, Bowthorpe, Norwich is too small to expand and has temporary portakabins on site.</p>	
7574	<p>Norfolk Wildlife Trust It should be made clear that extensive new green infrastructure is needed in relation to development between Wymondham and the bypass in addition to that between Hethersett and Wymondham. We assume that this is intended with references to Tiffey valley but it should be made more explicit.</p>	
7599	<p>Thurton Parish Council</p> <p>Option 1 is the most viable in terms of the findings of the underpinning studies. Option 2 & 3 are likely to result in even more development coming to South Norfolk as it will be difficult, in planning terms, to limit development to Wymondham.</p> <p>It is also highly unlikely that the levels of development proposed for Long Stratton will fund a by-pass for the necessary growth in schools and other infrastructure.</p>	



7609	<p>Trafford Trust Estates</p> <p>4. STRATEGY FOR GROWTH</p> <p>Issues and Options</p> <p>4.1. Our clients were concerned at the emphasis placed in the Issues and Options Consultation Report of November 2007 upon the provision of secondary education as the primary means by which to establish the scale and location of new development areas around Norwich. The general approach described at paragraphs 5.10-5.24 of the Consultation Report represented an inflexible and short-sighted view of the approach to be adopted regarding the identification of planned urban extensions. We consider that the distribution of urban extensions should recognise that new development areas can be added to existing neighbourhoods, thereby creating the scale of development needed to support a secondary school or other strategic infrastructure.</p> <p>New housing locations</p> <p>4.2. Our clients welcome the comment at paragraph 1.10 of the Technical Consultation that "to deliver the planned housing growth large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area, is proposed." The Technical Consultation recognises the possibility of utilising planned urban extensions of a more moderate scale than that proposed in the earlier Consultation Report, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Furthermore, Policies 7 and 8 rightly acknowledge the important and sustainable roles to be played by Key Service Centres such as Wroxham and Service Villages such as Rackheath and Spixworth.</p> <p>4.3. The achievement of the necessary housing and employment delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions at Norwich and appropriate development areas at other settlements, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. It is vital to confirm that the proposed new development areas are integrated with existing built-up areas, not physically/socially divorced from them. The new development areas must exhibit a strong degree of interaction with existing urban areas if the objectives enshrined in the East of England Plan for Broadland/Norwich/South Norfolk are to be fulfilled.</p> <p>4.4. We do not consider that it will be possible to bring forward larger-scale development areas quickly. Given that proposition, it is entirely appropriate for the Technical Consultation to recognise that the delivery of the growth agenda must incorporate a mixture of large scale and small/medium scale development locations, dispersed around the wider</p>
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	<p>Broadland/Norwich/South Norfolk area in suitable/sustainable locations.</p> <p>4.5. Our clients acknowledge the change in emphasis between the Issues and Options Consultation Report and the present Technical Consultation as effectively described at paragraph 1.10 of the Technical Consultation. Given that context, they endorse Policies 1, 2, 5, 7 and 8 of the Technical Consultation as, in combination, they provide a policy framework/spatial strategy capable of delivering the objective enshrined in paragraph 1.10 of the present Consultation.</p>	
<p>7612</p>	<p>Yare Valley Society</p> <p>Options 1 & 2 Pages 66 & 70: South West Sector With regard to the possible major development at Hethersett/Little Melton (Options 1 and 2) we are concerned that it would create pressures for changes to the links with the City. The existing road links and junctions are already overloaded at times and developments already approved or in hand will add to the problems. New large scale developments will create pressures for further major roadworks, potentially damaging to the environment and to the Yare valley in particular.</p>	
<p>7618</p>	<p>CGMS Ltd The critical infrastructure requirements have been correctly identified This response is made on behalf of the promoters of the Rackheath Eco-community - Barratt Strategic, Manor Farm Rackheath Ltd and Building Partnerships.</p> <p>Introduction</p> <p>Since our initial representation to the Issues and Options document, which sought to promote the development of land at Rackheath for a sustainable community, progress on the Government's Eco-towns initiative has led to the identification of the north-east sector of Greater Norwich as a potential site for an Eco-community. This is entirely consistent with our earlier proposals, but would imply a greater scale of development. We are currently revising our proposals and it is likely that we will be bringing forward revised proposals for a settlement of around 4000 new dwellings. The intention is that this development should be fully integrated with the existing settlement at Rackheath, and the established industrial areas, to create a community of around 5000 dwellings with a full range of services and facilities. This is being planned in accordance with the government's Eco-towns objectives and standards - as set out in the DCLG Eco-towns progress report of July 2008. We believe that the Eco-community will be consistent with the aspirations of the emerging Joint Core Strategy and consider that it is important that it is brought forward as part of a strategic planned approach to the area endorsed by the key stakeholders.</p> <p>We welcome the fact that the Strategy sees new communities as a means of delivering strategic levels of growth in the Norwich Policy Area. The vision of each one being "a distinctive high quality sustainable community with a vibrant and attractive district centre and a network of local centres serving existing neighbouring communities and new residents alike providing shops, health, education and community services easily accessible by foot, bicycle and public transport" is exactly what we will be trying to achieve at</p>	



	<p>Rackheath. In our response to the Issues and Options document we highlighted how the community at Rackheath would meet the objectives of the Strategy.</p> <p>Critical infrastructure (Question1)</p> <p>We agree with your assessment of the critical infrastructure requirements and as part of the Eco-community development process we will be working with the utility companies to ensure that appropriate improvements to water supply and sewage disposal are secured. However in accordance with sustainability principles we will be designing the development to minimise both water consumption and the need to dispose of waste off-site. We would anticipate that similar approaches will be adopted for the other major allocations identified in the emerging Strategy, thus reducing pressures on existing infrastructure and the need for significant investment to secure improvements to it.</p> <p>While the Northern Norwich Distributor Route is not critical to the Rackheath Eco-community, we consider that its implementation will benefit economic development in the area. In addition it will provide a key orbital route, which will enable us to develop high quality public transport links between the Broadlands Business Park area, the community and the Airport. Implementation of the Norwich Area Transportation Strategy will also support our proposals for wider cross-city public transport connections.</p> <p>The provision of affordable housing is a key concern and we are currently planning on the basis of up to 40% affordable housing in the Ecomunity. It is important that all major developments are self sufficient in the key services as far as possible. New development can also bring benefits to existing communities by providing critical mass to allow service levels to be enhanced.</p> <p>Policies for Places</p> <p>Policy 1 Settlement hierarchy - we agree with the hierarchy as proposed.</p> <p>Policy 2 Strategy for growth in the Norwich Policy Area - we agree with the overall strategy. While we do not disagree with the strategic locations for employment development, it is important to retain flexibility and there is a danger that this could be threatened by implied restriction on types of uses at the Airport and Hethel in particular. Proposals for the Northern Distributor Road, bus rapid transit and new rail halts at Broadland Business Park and Rackheath are supported. The Eco-community is actively investigating the prospects for high quality public transport, including innovative rail services on the Wymondham - Norwich - Wroxham axis.</p>	
7647	<p>Drivers Jonas In relation to Policy 5 "Locations for Major Change and Development in the Norwich Policy Area", CEMEX supports Option 1, which sets out a target of 4000 dwellings within the South West region (Hetherset/ Little Melton area) and 4000 dwellings in Wymondham. In towns situated within the South West region are many local amenities. For example, within Hetherset are many local amenities including a range of schools for the majority of age groups, a dental surgery, bank and pubs. Within</p>	



	<p>Wymondham are several schools, including Wymondham High School, Wymondham College, and several primary schools. In addition, the town boasts an active high street with a range of shops, cafes, restaurants. There are also over 10 doctors surgeries within the area. There are also regular train services to Cambridge and several bus services to nearby settlements. A greater level of development in Hetherset and Wymondham would be considered sustainable, as these areas have established services and infrastructure. Consequently, CEMEX considers Option 1 to accord with PPS1, Paragraph vii:</p> <p>"Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges."</p> <p>Option 1 would also prevent development on greenfield land, which is considered less suitable for development, in other locations. This would accord with PPS1, Paragraph 20:</p> <p>"Development plan policies should take account of environmental issues such as the protection of the wider countryside and the impact of development on landscape quality."</p> <p>In addition, Option 1 would accord with PPS3, Paragraph 10, which seeks housing developments near a range of community facilities, with good access to jobs, key services and infrastructure.</p> <p>With reference to CEMEX supporting development within the South West region, and in particular Hetherset, if a greater level of residential development was located in this area, further recreational space would need to be provided. CEMEX, therefore, urges the Councils to consider their site in Bawburgh for water sports/ recreational space. CEMEX considers the development of this site for such a use to be in accordance with Planning Policy Guidance 17: Planning for Open Space, Sport and Recreation, Objective ii, which states that Local Planning Authorities should:</p> <p>"Provide appropriate leisure opportunities to enable urban and rural dwellers to enjoy the wider countryside."</p> <p>In addition, CEMEX urges the Councils to consider their site in Wymondham for a sustainable residential extension to Wymondham, to help meet the housing requirements in the NPA. As already set out, Wymondham is an established settlement offering a range of amenities and services. The development of this site for dwellings would accord with PPS1 and PPS3 which seek development in existing settlements, in accessible locations (PPS1, Paragraph 27 and PPS3, Paragraph 36).</p>	
7651	<p>Hempnall Parish Council Hempnall Parish Council strongly objects to all three options. The amount of housing development is incompatible with maintaining a rural hinterland to Norwich, something which Hempnall Parish Council considers to be extremely valuable to the county as a whole.</p>	



7656	<p>Highways Agency</p> <p>Policy 5 - Locations for major change and development in the Norwich Policy Area</p> <p>This policy outlines three different options regarding growth. Option 1 has been commented on previously by the Highways Agency. Options 2 and 3 consist of more development away from the A11 and nearer the A140 (non Trunk Road). The Highways Agency agrees with the statement that the differences between the options need further evaluation.</p>	
7661	<p>Highways Agency</p> <p>Option 1</p> <p>Option 1 comprises major development at Wymondham and Hethersett in the All corridor, to the north east of Norwich and to the west of Norwich on the A47 Trunk Road.</p> <p>Option 1 correctly identifies a key dependency of this Option as being significant highway improvements at the following locations on the A47 Trunk Road network:</p> <ul style="list-style-type: none"> AI074 Longwater junction B1108 Watton Road (Colney) junction A11 Thickthorn junction A1042 Postwick junction (to include a connection with the Norwich Northern Distributor Road) <p>However, no indication is given as to the nature, scale, feasibility or cost of the improvements required, and whether or not their effectiveness to deal with the forecast traffic flows has been modelled. More evidence is required on this issue.</p> <p>A primary public transport linkage is stated as being a bus-based rapid transit corridor along the Newmarket Road (A11). Under 'key dependencies' this is stated as something that 'will be' whereas under the 'South-west sector' it is referred to as 'possibly' being along the Newmarket Road. This suggests a degree of uncertainty as to whether this is a definitive proposal or whether there is some possibility of routing the bus-based rapid transit along another corridor other than the AI 1. This should be clarified. In addition, no indication is given as to the nature of the connection that would be required to deliver bus priority across the A47 through the critical Thickthorn interchange.</p> <p>The possibility of having to supplement this connection with bus priority measures across the A47 at Hethersett Lane (currently a narrow country lane which crosses the A47 on an overbridge) is acknowledged. The concept of making a direct connection between this development area and the employment area centred on the Norwich research park, hospital and university, without buses having to traverse the Thickthorn junction is to be welcomed. The possibility of having to upgrade (or supplement) the existing Hethersett Lane bridge and the associated infrastructure costs should be acknowledged.</p>	



	<p>In respect of the North East sector (Sprowston/Rackheath), the idea of a new rail halt at Rackheath and the possibility of an Orbital bus service linking this area with employment areas such as the Airport and Broadland Business Parks should be supported. More evidence is required, however, to demonstrate their feasibility/viability and (in the case of the rail halt) rail industry support.</p> <p>In respect of Wymondham, the principle of locating new development to the SE of the town to maximise accessibility to the town centre and rail station is to be welcomed. The opportunity to maximise use of existing rail connections should be supported, although what this means in practice is not defined. The possibility that further expansion to the SE of Wymondham might increase pressure for a new or replacement interchange on the A1 Trunk Road is not mentioned and the Highways agency should be aware of this.</p> <p>Development to the west of Norwich, in the Costessy and Easton area was previously considered as a reserve site' for the longer term. In this Option it appears to have the same status as the other identified development areas. This should be clarified.</p> <p>This location is said to be dependent upon capacity expansion of the A47 Longwater junction and the Highways Agency would concur with this view. We are aware that there is a County Council scheme under preparation that would significantly increase the capacity of the current junction at Longwater. The status of this scheme in relation to the LDF allocation should be clarified and if necessary its traffic capacity reviewed in the light of the additional development now being proposed.</p> <p>The Highways Agency's view is that major residential development in the Longwater area is inherently less sustainable than the other locations proposed. Although there is an employment area at Longwater, there are no proposals to enlarge it (the phrase used in Policy 2 is only consolidation of activity)' and this could lead to a larger proportion of out-commuting from a residential area here.</p> <p>There is no indication as to whether the site(s) being considered lie to the north or the south of the A47: if they are to the south (eg at Easton), the question of how local movements between the new residential area and the existing employment (and retail) area can be encouraged to use non-car modes of travel should be investigated and if necessary suitable infrastructure to facilitate this identified.</p>	
7677	<p>Andrew Martin Associates The Royal Norwich Golf Club Site (see attached plan ref: 08074/01).</p> <p>The usual infrastructure associated with a development of this size would be required. With regard to transport infrastructure, it is recognised that Drayton Road suffers congestion at peak times. However, it should be noted that various junction improvements have been undertaken by the Council. These coupled with the proposed Norwich Northern Distributor Road will improve the traffic in the vicinity of the site. Assessments will be undertaken with regard to the impact of the proposed development and appropriate mitigation measures will be implemented.</p>	



	<p>It is understood that the existing foul drainage system through Norwich is assumed to be at capacity and flows from development in this area would have to pass through Norwich. The Greater Norwich Water Cycle Study will investigate this further and examine whether other alternative treatment sites are required. We will also be liaising with the Environment Agency to ensure that this issue is addressed. -</p>	
7690	<p>Trustees of Beston Estate Believed to be identified already. We assume that the North East Sector Sprowston/Rackheath growth area would include fields 11-14 and 18-20, as on attached map, south of a line along Beeston Lane [two adjacent blocks, respectively 38.44ha and 38.34ha].</p>	
7707	<p>Pegasus Planning Group</p> <p>1.2. Brown & Co, on behalf of the Trustees of the Gurloque Settlement, Trustees of Norwich Consolidated Charities, Trustees of Anguish's Educational Foundation and the Trustees of the Great Hospital, have requested that a response be submitted on the content of the emerging JCS with regard to the potential of land at Cringleford to accommodate a high quality business park and housing, thereby creating a distinctive gateway on the strategically significant approach to the centre of Norwich along the A11 corridor. It can contribute towards the achievement of a sound spatial strategy.</p> <p>1.3. The land at Cringleford can make a meaningful contribution to the delivery of the new employment and housing required in the Norwich area by virtue of Policy NR1 of the East of England Plan. The creation of a high quality entrance to the Norwich urban area will provide a positive response to Policy 4 of the Technical Consultation which seeks an improvement to the 'gateways' to Norwich.</p> <p>1.4. Our clients agree with the comment at paragraph 13.68 of the East of England Plan to the effect that the Norwich area has the potential to develop further as a major focus for long term economic development and growth. In the light of this policy perspective, it is important to ensure that the Joint Core Strategy provides a robust and flexible spatial strategy, capable of realising the potential of the Norwich area in the period to 2021 and beyond. The JCS should secure the base from which the necessary step-change in economic and housing delivery is achieved in the short/medium term whilst identifying a sound spatial policy framework for the longer term.</p> <p>2. STRATEGY FOR GROWTH IN THE NORWICH POLICY AREA</p> <p>Issues and Options</p> <p>2.1. Our clients were concerned at the emphasis placed in the Issues and Options Consultation Report of November 2007 upon the provision of secondary education as the primary means by which to establish the scale and location of new development areas around Norwich. The general approach described at paragraphs 5.10-5.24 of the Consultation Report represented an inflexible and short-sighted view of the approach to be adopted regarding the identification of planned urban extensions. We consider that the distribution of urban extensions should recognise that new</p>	



development areas can be added to existing neighbourhoods, thereby creating the scale of development needed to support a secondary school or other strategic infrastructure.

New housing locations

2.2. Our clients welcome the comment at paragraph 1.10 of the Technical Consultation that "to deliver the planned housing growth large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area, is proposed." The Technical Consultation recognises the possibility of utilising planned urban extensions of a more moderate scale than that proposed in the earlier Consultation Report, interlinked with an existing neighbourhood of Norwich, to create the economies of scale capable of supporting/providing, in tandem, high quality public transport services, enhanced retail opportunities and improved education provision. Medium scale urban extensions can make a significant and sustainable contribution to the growth agenda and the regeneration of deprived areas of Norwich.

2.3. The achievement of the necessary housing and employment delivery rates in the short/medium term will arise if the spatial strategy promotes an approach which incorporates a range of urban extensions, both in terms of scale and distribution. In the early years of the period to be covered by the Joint Core Strategy, the required rate of delivery will be achieved by concentrating new development on sites that presently have the benefit of planning permission and new allocations which can be developed in the short/medium term, augmenting and building upon existing facilities in established neighbourhoods. It is vital to confirm that the proposed new development areas are integrated with the existing built-up area of Norwich, not physically/socially divorced from it. The new development areas must exhibit a strong degree of interaction with the existing urban area if the objectives enshrined in Policy NR1 of the East of England Plan are to be fulfilled.

2.4. We do not consider that it will be possible to bring forward larger-scale development areas quickly. Given that proposition, it is entirely appropriate for the Technical Consultation to recognise that the delivery of the growth agenda must incorporate a mixture of large scale and small/medium scale development locations, dispersed around the Norwich area in suitable/sustainable locations.

2.5. Our clients acknowledge the change in emphasis between the Issues and Options Consultation Report and the present Technical Consultation as effectively described at paragraph 1.10 of the Technical Consultation. Given that context, they endorse Policies 1, 2, 4 and 5 of the Technical Consultation as, in combination, they provide a policy framework/spatial strategy capable of delivering the objective enshrined in paragraph 1.10 of the present Consultation.

Strategic employment locations

2.6. We agree with the observation in Policy 2 of the Consultation that the focus for major growth and development will be the Norwich Policy Area as defined in Appendix four. Our clients equally support the proposition that further employment development is envisaged at strategic locations,



including Cringleford/Colney.

2.7. The Spatial Vision within the Technical Consultation acknowledges that significant change will arise in the area covered by the Joint Core Strategy in order to accommodate the requirements for new homes and jobs established in the East of England Plan. The Vision anticipates investment at strategic and other employment locations, including Cringleford/Colney, which will help create a stronger economy. Furthermore, Objective 5 acknowledges that sufficient land for employment development will be allocated to meet the needs of inward investment, new businesses and existing businesses wishing to expand or relocate. Objective 5 states that Cringleford/Colney will be a focus of further employment growth in the Norwich Policy Area.

2.8. Policy 1 of the Technical Consultation contains a settlement hierarchy which describes Cringleford and Colney as being part of the wider Norwich urban area. Policy 2, outlining the strategy for growth in the Norwich Policy Area, expects a significant expansion of employment opportunities in the general UEA/NRP area. Policy 2 of the Technical Consultation also anticipates at least 2,000 dwellings on small/medium sites in sustainable locations in the Norwich urban area as defined in Policy 1.

2.9. Paragraph 7.5 of the Technical Consultation states that the existing suburbs and immediate urban/rural fringe "are a key to the successful development of the area. They are home to a significant number of people, businesses and environmental assets, and provide the links between the city centre and the surrounding area. There are a range of opportunities for redevelopment, regeneration and enhancement. The range of issues warrants a comprehensive and dedicated strategy." Policy 4 notes that opportunities will be sought throughout the suburban area to improve "the gateways to Norwich by seeking co-ordinated environmental and townscape improvements on all major routes from the urban edge to the City Centre." Furthermore, Policy 4 notes that the planned enhancement of public transport will incorporate a bus rapid transit network on routes linking the City Centre to certain locations, including Cringleford/NRP.

2.10. Our clients endorse the spatial planning approach envisaged in Policy 1, Policy 2, Policy 4 and paragraph 7.5 of the Technical Consultation. When the spatial elements outlined are combined, a sustainable policy outcome would be the identification of a gateway development off Newmarket Road, to the east of the Thickthorn Interchange. The A11 is the most significant strategic gateway into Norwich and should be the location of a high quality business park/housing development area, forming a logical extension of the employment opportunities off Colney Lane and the new housing off Round House Way. The junction between the A11 and the A47 constitutes a clear strategic hub and the land either side of Newmarket Road should form part of the spatial strategic framework for the Norwich area, enabling the gateway concept described in Policy 4 of the Technical Consultation to be effected.

2.11. Policy 4 also notes that "green infrastructure and links between currently fragmented habitats and to the rural fringe will be protected, maintained and enhanced." This will include, inter alia, the completion of a riverside and river valley walks "extending out into the surrounding countryside." Our clients own land in the Yare Valley off Keswick Road/The Loke and in the vicinity of Cringleford Wood/Gurney Lane. These areas could form part of the wider green infrastructure anticipated in Policy 4, brought



	<p>forward as part of the wider Newmarket Road Gateway. In this way, a comprehensive strategy can be delivered in the Cringleford area to improve this strategically significant gateway to Norwich whilst enhancing green infrastructure, two key components of Policy 4 of the Technical Consultation.</p> <p>2.12. Paragraph 13.65 of the East of England Plan acknowledges that road and rail links with Norwich are improving, "particularly on the A11 corridor." Paragraph 13.67 of the EEP notes that the Norwich area's economic strengths include a diverse economic base and it is stated that "there are opportunities to build on existing strengths", with Norwich being able to benefit from its status as a major economic driver for a significant area of the Region. The EEP, at paragraph 13.69, refers to green infrastructure as a key delivery issue. The package of proposals advanced by our clients in connection with their vision of a Norwich Gateway will clearly deliver/implement policy positions/expectations established in the East of England Plan.</p>	
7720	<p>Kimberley & Carleton Forehoe Parish Council This option would be dependant on the linking up of the NNDR and the A47. The infrastructure required for this option would make it by far the most expensive.</p>	
7758	<p>Entec UK The consultation document identifies much of the major infrastructure required to accommodate growth in this option. However, growth option 1 identifies 4,000 dwellings in the Hethersett/Little Melton Area.</p> <p>Appendix 4 of the Core Strategy Issues and Options stated that: "With good existing priority measures capable of expansion and fast journey times, this appears to be the best location for the provision of very high quality public transport. The area is reasonably well located to a choice of existing employment sites. While there could be capacity in the High School to support relatively limited growth a larger development would be possible and would be much more likely to support high quality public transport and new large scale local services. Capacity to accommodate a large new/expanded settlement is worthy of further investigation."</p> <p>However it added: "No existing capacity in Hethersett High School, but there would be capacity to support perhaps circa 2,000 dwellings if the co-located primary could be relocated. Larger scale development would require an additional secondary or a relocation and expansion of the existing school"</p> <p>Whilst it is acknowledged that the Hethersett area has good public transport it clearly does not have the social infrastructure to accommodate 4,000 new homes. The village has a limited number of services within walking distance, and the allocation of houses here would encourage car based travel. Development within this area would also be contrary to current planning policies which seek to prevent the coalescence of Wymondham and Norwich respectively.</p>	



7787	Long Stratton Parish Council For Leisure facilities and for street lighting.. More dwellings in Hethersett and Wymondham could mean more traffic on the roads in and out of Long Stratton - these would need to be upgraded as vehicles travel across country in many instances - no matter what the A 140 bypass is required to be in place first should Option 2 or 3 eventually be proceeded with.	
7814	NHS Norfolk From the healthcare perspective, with this level of growth, aside from the primary care facilities that are implied in the 3 options, NHS Norfolk would need to consider what additional capacity will be required for community services (ie district nursing, health visiting, midwifery, physio etc) as well as secondary care capacity (including acute and mental health care).	
7838	Scott-Brown Partnership None	
7855	Wymondham Town Council Concern that there is no mention of increased leisure facilities for use by all age groups, including youth activities. The provision of sports grounds and pitches together with community halls and the attraction of leisure businesses (eg Cinemas) is considered a vital infrastructure requirement to support communities.	



Q4. FOR OPTION 1 - What are the constraints to delivery?	
	There were 37 responses to this question. One response says there are no significant constraints.
	Key issues include traffic and road infrastructure, site assembly and coordination, infrastructure costs, clarity of the settlement hierarchy, water availability and quality, environmental and conservation issues, police infrastructure, archaeological sites, coordination of services/infrastructure, the planning system, employment uses, site availability, identity of Hethersett, infrastructure timing, investment in public transport, water/drainage and healthcare. Communities mentioned include Elvedon, Wymondham, Longwater, Cringleford and Attleborough, various SSSIs / nature reserves, Easton, Colney, Harford Bridge, Hethersett, Rackheath, and Thorpe End.
6842	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report
6908	Little Melton Parish Council mention the proposed improvements to the A11 at Elvedon, expansion of the NRP, additional housing at Wymondham, Longwater , Cringleford and Attleborough will all put additional load on the B1108/A47/A11 - to put a new town into the middle of this would be disastrous!
6928/9	Thos. Wm. Gaze & Son None. Delivery of housing land in Wymondham will require considerable site assembly and co-ordination of landowners by a promoter
6946	Woods Hardwick Planning refer to the cost of large scale infrastructure provision and the time taken to develop it. Links should be made with the existing infrastructure to remove this potential constraint.
6978	Diocese of Norwich say Policy 1 'Settlement Hierarchy', seeks to direct growth firstly to Norwich and the fringes of Norwich, then to 'Major mixed-use developments in specified locations', followed by growth at Main Towns, then Key Service Centres, then Service Villages and finally Other Villages. Although the Diocese of Norwich consider this approach to be broadly consistent with Government Guidance contained within Planning Policy Statement 3: Housing (PPS3) and the Adopted East of England Plan, we consider that the approach is not completely clear in terms of what is constituted by 'Major mixed-use developments in specified locations within the Norwich Policy Area'. For example, if growth of 4,000 dwellings takes place at Wymondham, as envisaged under Option 1 of Policy 5 'Locations for major change and development in the Norwich Policy Area', it would be anticipated that such development would be a major mixed-use development. As Wymondham is a 'Main Town', it is not clear whether growth envisaged at Wymondham would constitute either the second or third location type under Policy 1 Settlement Hierarchy. There is therefore a need for greater clarity in terms of the proposed Settlement Hierarchy



7007	<p>Natural England mention issues over water availability and quality; proximity to designated sites (including County Wildlife Sites and Roadside Nature Reserves as well as statutorily designated sites - please see attached further information); impacts on protected species (with special reference to great crested newts in the south Norfolk claylands); impacts on biodiversity action plan species and habitats; potential to damage linkages and green corridors between existing sites of biodiversity importance; funding shortfalls especially with regard to continuing management of green infrastructure provision. Notwithstanding the above, when individual site allocations are proposed, it will be necessary to survey the sites for protected species and priority BAP habitats and species. The following sites are within the Norwich policy area and thus have the potential to be adversely affected by the strategic growth locations identified in Option 1:</p> <p>Sites of Special Scientific Interest Catton Grove Chalk Pit SSSI Sweetbriar Road Meadow SSSI Eaton Chalk Pit SSSI River Wensum SSSI/Special Area of Conservation (SAC) Caistor St Edmund Chalk Pit SSSI St James Pit SSSI Bramerton Pits SSSI Yare Broads & Marshes SSSI Lower Wood, Ashwellthorpe SSSI Crostwick Marsh SSSI Bure Broads & Marshes SSSI Sea Mere, Hingham SSSI Coston Fen, Runhall SSSI</p> <p>Local Nature Reserves Wensum Valley (Mile Cross & Sycamore Crescent) Bowthorpe Marsh Earlham Park Woods Marston Marshes Eaton Common Whitlingham Marsh Lion Wood Danby Wood Dunston Common Silfield Toll's Meadow</p> <p>Please see attached for County Wildlife Sites and Roadside Nature Reserves</p>	
7019	<p>Easton College There are no significant constraints to delivery. The landowners are working together to ensure that development can be brought forward at the earliest opportunity.</p>	
7043	<p>Horsham & Newton St Faith Parish Council In detail we are concerned that the triangle symbol for this proposed strategic employment business park on all three option diagrams is located to the south of the proposed northern distributor road (NNDR) and on land that is within the operational area of the airport and is not therefore available for development.</p>	



7047	Mr & Mrs L Dale Little in support of any of the 3 options to show how phased regular supply of building plots can be assured. Surely a very critical consideration, if we are to meet the Government's timescale demands	
7084	Hevingham Parish Council Doubts over the provision of infrastructure first	
7093	Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.	
7120	<p>Thorpe and Felthorpe Trust Building new communities where people wish to live work, study and enjoy requires careful planning, consensus building, and critically, good urban design to create a robust urban and infrastructure framework. It also requires the coordination of a range of public sector organisations and the private sector to facilitate cross sectoral co-operation and ensure that adequate investment is available in order to deliver the necessary infrastructure to support new communities. It is also critical that consideration is given from the outset to planning for viable, economically sustainable infrastructure provision from a revenue perspective.</p> <p>TFT continue to work together with other landowners to develop a comprehensive strategy to promote their land to contribute towards accommodating the future growth of the City. This consortium is a strong starting point in identifying and overcoming constraints in delivering major growth in North East Norwich.</p> <p>Currently, the consortium is looking at models that support the principles of place making, including market leading research that that has been produced jointly by Savills and the Princes Foundation (attached as appendix 1). Such models will require further focus on site specific issues in locating a new settlement in North East Norwich, particularly in relation to timeframes for the delivery of key infrastructure, including the potential imposition of an infrastructure levy and the availability of public funding.</p> <p>The TFT have consistently promoted Enquiry by Design as a planning and design tool, which engages the community, stakeholders, full design team and local interests at the outset of the masterplanning process. This works to resolve issues at the earliest stages of a scheme and quickly proceed towards an optimal area masterplan. The method has demonstrated its credentials at Sherford in South Hams, where an outline planning permission for 5,500 new dwellings; 67,000 square meters of business and commercial space; 16,700 square meters of mixed retail accommodation, community and open space facilities; three primary schools and one secondary school; health care centre; community park; two community wind turbines; a park and ride interchange was achieved in a two year period.</p> <p>A further advantage of the Enquiry by Design route at North East Norwich would be that it would serve to identify the enabling infrastructure requirement for the sustainable urban extension within a relatively short timeframe to underpin feasibility exercises, funding applications and</p>	



	<p>business planning.</p> <p>We attach relevant literature on new models for urbanism (appendix 2), which we aim to utilise in terms of both urban design and financial modelling for the expansion of Norwich. Such modelling will enable us to identify and overcome potential constraints. This will build on the case study of Sherford new settlement, which was identified in our 2006 submission (with the consent of Red Tree, the developer of this settlement).</p>	
7135	<p>Savills The landowners welcome the Core Strategy looking to 2026. It will be important to demonstrate that not only can growth be delivered over the period to 2026, but that also the RSS requirements for at least 33,000 homes in the Norwich Policy Area over the period 2001 - 2021 can be met.</p> <p>The area at North East Norwich is in multiple ownership. The landowners on whose behalf these representations are submitted are working together to drive the delivery of a significant urban extension in the broad area bounded by Wroxham Road, the proposed NNDR and A47 at the Postwick Interchange.</p> <p>The planning system is also a potential constraint to delivery. The landowners wish to work with the GNDR to move swiftly from an in principle decision regarding the broad location for development, to a site specific proposal and to secure planning permission. This will enable North East Norwich to make a significant contribution towards the need of the sub-region over the plan period and beyond.</p> <p>We see an important element of delivering development at North East Norwich as being the completion of an inner link from Wroxham Road to Broadland Business Park. Part of this will be provided through the already consented development for Persimmon at Blue Boar Lane and The Lothbury Trust is already bringing forward proposals to link Broadland Business Park to Plumstead Road. Completion of this link, as broadly indicated on the attached Plan A, will assist with connectivity and enable commencement of development in a key location close to the urban edge.</p>	
7170	<p>Costco Wholesale UK Ltd The Joint Core Strategy (JCS) indicates that the target for growth in employment is the provision of 35,000 new jobs between 2001 and 2021, and that an employment growth study has been carried out to identify the opportunities required to encourage this growth. In order to achieve the provision of this significant number of jobs the JCS should adopt a flexible, but clear framework in which to guide employment uses. A fundamental part of achieving this is to include a definition within the Core Strategy that provides guidance regarding uses that are appropriate on employment land, thereby protecting employment land from inappropriate uses.</p> <p>The lack of definition of uses appropriate on employment land creates a vague policy framework. This omission could potentially cause conflict in the future and may eventually either allow a range of inappropriate uses or prohibit those employment-generating uses not falling within the 'business use classes'. It would therefore represent a lost opportunity in terms of clarifying suitable employment generation, and provision of employment growth.</p>	



	<p>This representation proposes that a definition of appropriate 'employment uses' is included within the Core Strategy, which also recognises employment generating uses not falling within a use class - sui generis, to ensure that a range of employment uses is encouraged to provide for employment and choice. It is considered that the following definition would be appropriate for 'Employment Land':</p> <p>"All buildings and land which are used or designated for purposes within the Use Class B1, B2 and B8 and closely related sui generis uses (such as warehouse clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates."</p>	
7184	<p>Savills We are of the view that the baseline scenario set out in the Arup Study is the appropriate level at which to plan for job growth and that it can not be the intention of the RSS to limit job growth in the sub-region to below that baseline. Accordingly we agree that the Spatial Vision should be planning to deliver around 33,000 new jobs over the period 2006 - 2026.</p> <p>Whilst we consider the analysis in the Arup Study of job growth and land requirements to be a robust analysis, we consider that the Arup Study places insufficient emphasis on the availability of sites to drive job creation. The focus of the Arup Study appears to be on non-land use measures to deliver growth. We acknowledge the importance of such softer measures, however, we consider that a major element of the strategy must be to ensure that sufficient land is delivered to facilitate the provision of employment floorspace. Indeed, the Arup Study identifies (at para. 1.14) that there is a shortage of available land for development. Given this conclusion we are concerned that the options fail to deliver sufficient sites of the right type in the right location at the right time and that this will be a constraint on development . The strategy is reliant on sites which are constrained and unlikely therefore to deliver, particularly in the short term.</p> <p>Whilst we support growth at Colney, this site is constrained by access and land ownership issues and specifically reserved to meet the needs of the high tech' sector. Studies demonstrate the importance of the growth in high tech' sector and we agree that land should continue to be reserved for such uses. However, as a result there is a need to ensure that the strategy provides for opportunities elsewhere for other economic sectors to grow.</p> <p>We acknowledge the growth of the airport as an important driver of the local economy. However, the Arup Study suggests that this land will be required for uses directly-related to the airport. Such an approach is consistent with the approach previously pursued at Norwich and at other airports. Whilst such an approach supports growth of the economy there is a need to ensure that opportunities exist elsewhere for other non-aviation related businesses to grow. In addition, major growth at the airport will be dependent upon significantly improved access arrangements which are unlikely to be forthcoming in short to medium term.</p> <p>The Arup Employment Study recommends growth at Longwater. This appears to be based on comments in the supporting text in the South Norfolk Local Plan (SNLP) regarding the future potential of such land. The comments in the SNLP do not constitute policy. It is necessary therefore to compare Longwater against other potential locations. The Arup Study does</p>	



	<p>not appear to do this and further consideration needs to be given to the alternative locations for strategic employment provision. The Arup report also contends that Longwater is a good location for further business park activity. This is despite the fact that Longwater has proven to be an unattractive location for such activity over recent years. Longwater was allocated by the SNLP for B1/B2/B8 uses, but is dominated by retail and quasi-retail uses which in turn impacts on the perception of Longwater as a strategic location for industrial, office and warehousing development. No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. Conversely, there is clear evidence that locations south of the City are strongly in demand for industrial, office and warehousing development.</p> <p>In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery. Harford Bridge is strategically located on the southern side of Norwich in an area which business demands as a location. It is well placed to build on the success of the Broadland Business Park as a location and is immediately available for development. The attached masterplan framework document sets out how the site could be developed sensitively to respect the river corridor, to enhance the gateway to Norwich and to help deliver the objectives for public access and habitat recreation in the Yare Valley.</p> <p>Land at Harford Bridge should be allocated by the Core Strategy as an employment allocation.</p>	
7196	<p>Persimmon Homes In relation to Wymondham, concentrating urban expansion and an additional 4000 dwellings in one part of the town will require considerable investment in associated infrastructure, which will be largely reliant upon the rate of development in this location to be funded and implemented. Development on this scale will not only have a long lead in time but will also take some time to develop. Changing market conditions could also affect the rate of completions. There is therefore the risk that the dwellings and infrastructure will not be delivered in the required timescale. A strategy that spreads the new development around the town in a larger number of smaller developments carries less risk of delay and can make better use of existing infrastructure, whilst offering the opportunity to share the costs of any essential new infrastructure between various developers. The much shorter lead in period and spread of site and developers would also mean that it would be possible to take full advantage in due course of an improved housing market to achieve the delivery of the required increase in housing.</p>	
7208	<p>Salhouse Parish Council Lack of coordination between agencies.</p>	
7232	<p>Mr Richard Atkinson Programming of infrastructure works Ensuring adequate and timely investment in public transport</p>	
7349	<p>Mr Jim Hamshaw See question 3</p>	
7364	<p>I E Homes and Property Ltd Highway improvements required and see question 3 answer.</p>	



7431	<p>Environment Agency (Eastern Area Office) All infrastructure should be in place in time, and where relevant operational, for development. This is as applicable for green infrastructure as for conventional infrastructure. Use of phasing will be important to enable AWS to factor any required improvement works into their business plans.</p> <p>The WCS provides information on the relative constraints of development in the locations proposed we assume that the findings of stage 1 have already been taken into account when deciding on the proposed areas for development and that stage 2a will be used to narrow down the options further.</p> <p>Within Norwich City Centre, flood risk is likely to be the greatest environmental constraint. As discussed above, a level 2a SFRA would help to assess the varying risk across the City Centre and plan around it. We would also support an interdisciplinary approach, for example allocating green spaces to areas unsuitable for built development due to high flood risk. Such an approach may help reduce food risk overall by securing or even improving the provision of floodplain within Norwich.</p>	
7458	<p>Hethersett Parish Council Change in government policy. Housing market volatility. Erosion of green belt and open countryside. It is essential that Hethersett maintains its own identity</p>	
7499	<p>Bidwells It is important to emphasise that the above site has minimal constraints to delivery (questions 4 and 8) and therefore housing provision to meet demand could be brought forward in a relatively short space of time. As stated above, there are not anticipated to be significant infrastructure requirements although the impact upon the Longwater junction • which is expected to be minimal • will need to be confirmed. The site lies within Flood Zone 1 and given the current use of the site as agricultural land, it is not thought that there will be any significant issues in terms of archaeology or contamination. Work is also on-going with Norfolk Wildlife Services with regard to ecology to ensure that these issues are fully addressed once the site comes forward.</p>	
7533	<p>Mr Richard Atkinson Programming of infrastructure works. Ensuring adequate and timely investment in public transport</p>	
7555	<p>Norfolk Constabulary - Constraints to Delivery</p> <p>Norfolk Constabulary will require capital funding via the community levy scheme to provide additional Police infrastructure to growth areas.</p>	
7575	<p>Norfolk Wildlife Trust Regarding green infrastructure to the West, the Yare Valley and Bawburgh Lakes already have high biodiversity value and it will be critical to retain this value if there is increased public access to these areas. The evidence for this can be found in the number of County Wildlife Sites in the area whose ecological value is only maintained through management that seeks to zone areas for wildlife and for public access. In contrast Bawburgh Pits CWS currently provides a secluded wildlife area with limited public access and careful development would be required to ensure that increased access did not harm the biodiversity value of this area.</p>	



7619	CGMS Ltd Programming of infrastructure works Ensuring adequate and timely investment in public transport	
7678	Andrew Martin Associates The land owners and the developers for the RNGC have made a firm commitment to the delivery of this site. There are no insurmountable constraints to development	
7691	Trustees of Beston Estate Early development would be possible provided that all land west of A1151 is treated as a discrete part of the Growth sector, with its own Brief, and is not held back by being required to form a single Masterplan exercise with the Rackheath/Thorpe End main parts [as implied by para.9.11].	
7721	Kimberley & Carleton Forehoe Parish Council If this option was taken without a link between the NNDR and the A47 amount of traffic generated trying to access north of Norwich would be unsustainable.	
7759	Entec UK As stated previously the level of social infrastructure in Hethersett and Little Melton is incapable of absorbing 4,000 new dwellings. A larger amount of housing should be allocated in Wymondham where there is already a range of social infrastructure that could comfortably be developed further through the plan period.	
7788	Long Stratton Parish Council For Option I a thorough inspection in respect of the adequacy of drainage and water is required, and improvements as found to be necessary proceeded with There would need to be more employment opportunity. 4. Funding	
7815	NHS Norfolk This option would create additional jobs in the health sector. A major constraint to delivery could be availability of appropriately skilled staff in the primary, community and secondary healthcare sectors.	
7839	Scott-Brown Partnership The Option is heavily dependent on pre-provision of infrastructure and bringing forward new land in a hitherto undeveloped series of locations. This has obvious constraints in terms of the time taken before large new sites could contribute to meeting housing requirements - the current economic climate indicates how susceptible large new developments are to changing financial circumstances. There are obvious implications of a strategy which depends on a high level of new public infrastructure and developer contributions being at the mercy of fluctuating economic fortunes. In this connection - and this comment applies to all 3 Options - it is likely for example that the recent economic downturn will result in commencements and completions on current large sites being deferred until developers can secure a better return on their investment, so "large site dependency" is likely to result in an under-attainment against the 5 year requirement.	
7856	Wymondham Town Council In terms of the proposed increase in South & East Wymondham delivery is constrained by access to the proposed land. There is currently no access to the All and access to the existing Town centre is through a relatively narrow rail bridge. This will result in a separate community being created.	



Q5. FOR OPTION 1 - What opportunities does this option present?		
	There were 32 replies to this question.	
	Issues mentioned include a new sustainable community at Mangreen, sustainable transport infrastructure, environmental improvements, delivery of affordable homes and community facilities, a new business park, integration of sustainable homes and jobs, transport links, enhancing the strategic road network, use of park and ride, new green spaces / habitat, improved facilities and a cross-city development corridor. Communities mentioned include Mangreen, Rackheath, Easton, Norwich, Hethersett, Little Melton, Wymondham, Costessey, Thicketon, and Attleborough.	
6843	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6899	Falcon Property Solutions say Mangreen will be a vibrant new sustainable community, with superb community facilities and public transport links, which extend well beyond the settlement to enhance the quality of life for communities throughout the wider South Norwich area. The town will be a mecca for enterprise and innovation and a showcase for sustainable living. Mangreen will be a distinctive new community, carefully integrated within existing landscape patterns and making a positive contribution to the wider landscape setting of Norwich and the A47 southern bypass. The masterplan is designed to be outward-looking, with framed views to Norwich and the surrounding countryside. The gateway commons, country park and matrix of green infrastructure will enhance biodiversity and provide a distinctive landscape setting for carefully designed neighbourhoods and streetscapes, each with their own identity, but part of a unified place.	
6947	Woods Hardwick Planning A large scale growth location on land that is suitable for development with sustainable transport infrastructure. There is the potential to expand in the Rackheath Area in the future.	
7008	Natural England Creation of new green links and recreational facilities; enhancement of existing sites; embedding of green infrastructure in new developments; proactive adaptation to the future risks of climate change (green roofs, SUDs, solar panels, rainwater harvesting, drought resistant planting etc); more people accessing and appreciating the countryside; health benefits from 'greener' lifestyles.	
7020	Easton College This option supports the growth of Easton, the delivery of more affordable homes for local people at Easton and the development of improved community facilities, including village hall, recreational space, and transport services	



7036	<p>Gerald Eve The Morley Agricultural Foundation wish to express support for the proposed strategy for growth outlined in Policy 2. Particular support is expressed for the allocation of sufficient housing land to deliver at least 36,000 dwellings in the Norwich Policy Area in the period 2006 - 2026 in accordance with the identification of Norwich as a Key Centre for Development and Change. The focus on delivering development in the established urban area and urban fringe parishes in Broadland and South Norfolk identified in the supporting text to the Policy is also supported as the most appropriate strategy to maximise opportunities for delivering sustainable development that meets the city's strategic development needs.</p>	
7044	<p>Horsham & Newton St Faith Parish Council This proposal presents an opportunity to develop a new business park associated with the airport but on land that is capable of being developed in the short term. We request that the symbol be moved to the north of the NNDR, or at the very least to straddle it, so that it includes land over which Dencora 2000 Ltd has an option to purchase for employment development. Dencora is a well established and successful developer and manager of business parks both in and around Norwich and throughout East Anglia.</p>	
7123	<p>Thorpe and Felthorpe Trust The focus for TFT and the consortium is to integrate new homes with jobs and community infrastructure within a sustainable urban footprint and critically to link these key land uses and infrastructure with existing city fringe neighbourhoods as well as future communities to enhance amenity, sustainability and quality of life for all. The creation of a new urban extension in North East Norwich provides the opportunity to achieve this, while at the same time creating significant new capacity within the city for growth which will serve to enhance and compliment the historic core of the city. The sustainable urban extension will be comprised of vibrant, self-sustaining communities which are integral to the city but which do not place an undue pressure on the historic core and existing civic infrastructure. Rather they develop as a new, attractive place in their own right.</p> <p>In addition it will create the opportunities for:</p> <ul style="list-style-type: none"> • Improved connectivity between the city and 'fringe' communities; • Promoting sustainable modes of transport and creating 'walkable' neighbourhoods; • Enhancing and maintaining important landscape features and biodiversity, which are • important for informal recreation, health and well-being; • The creation of more jobs and better access to employment opportunities; • Delivering a choice of high quality housing within distinctive neighbourhoods; • Innovative urban design which creates a sense of place; • Increased services and facilities to serve local communities (both established and new); • Sustainable design and construction which encourages healthy, environmentally conscious lifestyles and reduces carbon dependency. 	



<p>7136</p>	<p>Savills (Mr Paul Brighton) This option enables the GNDP to take a long term strategic view concerning the direction of growth for Norwich. We consider that this Core Strategy should put in place an approach which will endure beyond the end of the Plan period. The appendices to the consultation document clarify that the options for North East Norwich involve longer term expansion beyond 2026 for at least 10,000 homes in total. With that in mind we consider that the Core Strategy should explicitly identify North East Norwich as an area of major growth for the plan period and beyond of at least 10,000, with 6,000 homes to be delivered by 2026. Putting in place this longer term strategy will assist in masterplanning new neighbourhoods and developing an infrastructure strategy.</p> <p>The option will enable further masterplanning work to be put in place for an integrated mixed use urban extension to Norwich based on the principles of walkable neighbourhoods and to plan strategically for the range of facilities needed by new communities, from education to transport to shopping and recreation. As part of that masterplanning we envisage the creation of a major new neighbourhood along Salhouse Road, close to the existing urban edge, including the provision of a district centre and significant new housing.</p> <p>The Option will enable the completion of an inner link from Wroxham Road to Broadland Business Park to improve connectivity and assist with delivery of new housing in a key location close to the urban edge. It will also enable further development of ideas for significant environmental enhancements and to contribute to the Green Infrastructure Strategy through measures such as heathland recreation.</p>	
<p>7171</p>	<p>Costco Wholesale UK Ltd The provision of a suitable employment definition would allow appropriate employment uses to locate with the Strategic Employment Locations and would therefore stimulate and encourage suitable growth within these areas. This representation is submitted on behalf of Costco Wholesale UK Ltd (Costco) who operate a number of wholesale warehouse clubs throughout the country, typically located on employment land. Costco operates sui generis membership warehouses and was created to serve the wholesaling needs of the small to medium sized business owner. At Costco, businesses can purchase products at wholesale prices, which are significantly lower than those of traditional sources of distribution. Businesses can obtain most of their inventory needs from under one roof. Each warehouse sells a wide range of products, although the variety within each product range is limited. This enables Costco Wholesale to serve a wide range of businesses, providing a core range of products at low prices.</p> <p>Costco is a reputable employer and would benefit the Broadland, Norwich and South Norfolk area by offering a range of employment opportunities to local people. The level of jobs provided by Costco compares favourably in employment density levels to traditional B Class Uses. The company provides local people with a broad range of quality jobs that reflect the unique nature of Costco's operations. In addition there would be indirect job creation through the support given to small local businesses.</p> <p>Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current</p>	



	<p>managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training.</p> <p>The benefits of a warehouse club such as Costco are that the positive impacts spread throughout the local economy. Costco's target customer is the small and medium businesses and many of these can be found in town centres. They include;</p> <ul style="list-style-type: none"> • Independent Retailers • Food and drink outlets such as restaurants and sandwich shops • Service outlets such as small estate agents, accountants, garages and professional firms • Independently owned hotels, guest houses etc <p>Costco can therefore make a significant contribution to the health of the local economy and, particularly to small businesses that are otherwise forced to pay a premium for small purchases from traditional wholesale sources. Costco's prices and its range of products are unique in this respect.</p> <p>The potential positive benefits of a Costco were the subject of an independent report by CB Hillier Parker of October 2000 "Costco Warehouse Clubs: An assessment of Economic Impacts". The report, enclosed, confirms the substantial cost savings potentially available to local businesses as well as the significant penetration, which Costco achieves of local business memberships. 78% of members questioned in the study agreed that Costco's low prices help them retain competitive and the study drew the conclusion that: -</p> <p>"...significant positive impacts would benefit local economies from the development of a Costco warehouse. (para. 6.10)"</p> <p>The construction of a Costco in the Broadland, Norwich and South Norfolk area would bring a number of benefits to small businesses and the wider economy in terms of employment generation for both a skilled and unskilled workforce. It is therefore important that provision is made within the JCS for a policy by which an application for a warehouse club and other sui generis uses acceptable on employment land could be assessed.</p>	
7185	Savills For the reasons outlined under Question 4 the option is likely to fail to realise the economic opportunity that the RSS growth strategy has put in place for the Norwich sub-region. In terms of employment growth therefore it represents a missed opportunity.	
7209	Salhouse Parish Council Major improvements to the items listed in Q3.	
7233	Mr Richard Atkinson The option would create a strong cross-city development corridor which would support high quality road- and rail-based public transport, making the best use of existing resources.	



7268	<p>Bidwells the locations for major change and development in the Norwich Policy Area), Option 1 or 2 is strongly preferred over Option 3. Hethersett/ Little Melton is situated very close to Norwich and nearby centres of activity, including Norwich Research Park, University of East Anglia, Norfolk and Norwich University Hospital, Wymondham and the Longwater Employment Area. It is located on the A1 1, is very close to Thickthorn Park & Ride site and has fast and frequent bus connections to Norwich and Wymondham. Hethersett therefore enjoys excellent public transport (bus) links to Norwich city centre, first-class road links (for freight and car travel) along the A11 corridor and (via Wymondham train station) good rail links to Norwich and Cambridge. The village also has a good range of shops and services meeting everyday needs.</p> <p>Bidwells and Gladedale (Anglia) Ltd have already undertaken a considerable amount of work promoting Hethersett/ Little Melton as a strategic growth location and initial investigations (e.g. on utility services, healthcare, education and the natural environment) have highlighted the strengths of the location, as well as identifying challenges to overcome.</p>	
7277	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (N PA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymondham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Pelham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer</p>	



fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary:

The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the All trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development; well connected and well served development; thriving and delivered on time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general



quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas, It confirms that landscape and design features can be put in place to mitigate any localised landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymondham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a 'business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 1 1 in Wymondham.

A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could



	<p>be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.</p>	
7297	<p>Breckland District Council The option presents an opportunity to enhance the strategic road network on the southern and western approaches to Norwich. The road network should be enhanced to facilitate public transport improvements including bus priority measures for both the Costessey and Thickthorn Park and Ride services via bus rapid transits. Road improvements for the A11 and A47 could also enhance the quality of service and journey times for longer distance bus routes accessing the city centre (employment and retail) from the growth locations identified in the Strategy and further afield. On this basis Breckland Council supports the requirement of 'bus rapid transit' from Wymondham into the City</p> <p>Breckland Council as a long term campaigner for improvements to the A11 and as a Member of the A47 Alliance would see this option as being a catalyst for A11 junction improvements (Thickthorn) and enhancements to the A47 west of Norwich - junction improvements at Longwater and Easton both of which experience congestion at peak times. Breckland Council supports the references</p> <p>In addition to road, a strategy of focussing growth to the south and west of Norwich should be underpinned by enhancements to the rail service from the city to Wymondham and Attleborough in terms of frequency and capacity of trains. Breckland Council supports the references in respect of Wymondham at pages 66 and 70 of enhanced bus services to the city centre and maximised use of rail connections.</p>	
7365	<p>I E Homes and Property Better use of park and ride</p>	
7434	<p>Environment Agency (Eastern Area Office) There are opportunities for new, planned green spaces, links and corridors. This would improve biodiversity and in some cases may create new wildlife habitat. There is an opportunity to improve water resource and waste water treatment provision, moving away from a reliance on old sewer networks, many of which are combined surface and foul water.</p>	
7459	<p>Hethersett Parish Council Additional employment to the area. Extra leisure facilities. Additional affordable housing. Possible sixth form college. New medical centre. Completion of cycleway to Wymondham.</p>	
7500	<p>Bidwells The site is in single ownership and Mr Green is committed to bringing development forward as soon as possible. Therefore when looking at the opportunities provided by Options 1 and 2 (questions 5 and 10), given the lack of constraints it is clear that this site could potentially make a rapid contribution in the early years of the Plan to the provision of 2000 dwellings. Larger sites in Costessey are likely to have more significant infrastructure requirements and potentially other issues to be overcome before development can commence, so delivering high levels of housing growth in the early years of the Plan is likely to place reliance on smaller sites coming forward, such as Mr Green's.</p> <p>It is considered that development of Mr Green's site has significant benefits, as it is situated very close to Norwich and nearby centres of activity including Norwich Research Park, University of East Anglia, Norfolk</p>	



	and Norwich University Hospital, Wymondham and the Longwater Employment Area. It is located on the A11 and close to the Thickthorn Park & Ride site enjoying excellent public transport (bus) links to Norwich City Centre. These advantages are also shared by the significant growth proposed for Hethersett/ Little Melton under options 1 and 2 and therefore Mr Green supports strongly the choice of either Option 1 or Option 2 (questions 7 and 12).	
7534	Mr Richard Atkinson The option would create a strong cross-city development corridor which would support high quality road- and rail-based public transport, making the best use of existing resources.	
7558	Norfolk Constabulary – Opportunities Norfolk Constabulary considers that growth will provide the opportunity for greater cross working between public service providers to share new infrastructure (sites) to mitigate the cost impact to services and the public.	
7576	Norfolk Wildlife Trust The opportunity to create new biodiversity rich landscapes to link with existing areas such as the Broads and the South Norfolk landscape of commons and woodlands. It should be made clear that habitat creation in the north-east sector will encompass parkland, grassland and woodland in addition to heathland. Heathland was the main historic component of this area but habitat creation will need to include other habitats particularly in those areas outside of the historic boundary of Mousehold Heath (as shown in Fadens maps of 1797). In order to provide further access opportunities and to take the pressure off habitats in the Yare valley bottom (see question 4), it is important that green infrastructure in this area should include the valley slopes and include woodland, grassland and former heathland habitats.	
7620	CGMS Ltd The option would create a strong cross-city development corridor which would support high quality road- and rail-based public transport, making the best use of existing resources.	
7679	Andrew Martin Associates The proposals for the Royal Norwich Golf Club help to meet the housing requirement in a sustainable location in accordance with the spatial vision for the Norwich Policy Area	
7692	Trustees of Beston Estate Farm ownership and occupation interests can both enable an early phased development in conjunction with Norfolk CC land, and assumed to be required in 2010-16. The land is adjacent to the existing urban area utilities and facilities, with public transport. The landscape compartments and retention of historic parkland framework in this sub-area tend to favour a development form as an extension of the urban area, rather than being part of a contiguous Rackheath new town.	
7722	Kimberley & Carleton Forehoe Parish Council Limited. The amount of investment in restricted existing environments at Easton, Wymondham and Hethersett make this an unviable option.	



7760	Entec UK Previous technical work undertaken by the GNDP has suggested that Wymondham is capable of delivering 6000-8000 new dwellings. The option being suggested currently allocates only 4,000 new homes in Wymondham. This should be increased, based on the Joint Core Strategy evidence base. Wymondham is well connected to key locations, with a range of social infrastructure, employment and retail to accommodate such growth.	
7789	Long Stratton Parish Council Ensuring satisfaction- removal of unpleasant smells	
7816	NHS Norfolk This option presents the opportunity to review and plan strategically for the health needs of the Greater Norwich Area over the next 15 - 20 years.	
7857	Wymondham Town Council The only perceived benefits to this large scale development is the provision of a new high school rather than improvements to existing schools should option 2 or 3 be chosen.	



Q6. FOR OPTION 1 - How will this link with your longer term investment strategies?		
	There were 21 responses to this question. One is completely opposed.	
	Issues raised include meeting sustainable growth objectives, development in Little Melton, expansion in the Rackheath area, investment in community facilities, policing, a strategic employment site at Norwich airport and habitat creation. Communities mentioned include Mangreen, Swardeston, Mulbarton, Swainsthorpe, Norwich, Little Melton, Rackheath, Easton and Hetherset and Wymondham.	
6844	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6900	<p>Falcon Property Solutions The Norwich area is one of 29 'growth points' identified in 2006 as part of the Government's Sustainable Communities Plan. The Norwich growth point has a challenging timescale to accommodate 25,400 additional dwellings (taking account of those already built or allocated) by 2026 and 35,000 new jobs between 2001 and 2021. This means that over the coming years there will be a substantial increase in the rate of house building and associated development such as schools and roads. The sustainable growth agenda provides the opportunity and momentum for an innovative approach as this high level of growth must be delivered in a sustainable way.</p> <p>Greater Norwich Development Partnership (GNDP) is developing long term plans for housing growth and jobs to give effect to the policies in the East of England Plan. On 1st August 2008 the GNDP published a Technical Consultation Document which put forward three growth options for the area; option 3 includes the provision of a new "country town" of 4,500 houses in the Mangreen / Swardeston / Mulbarton / Swainsthorpe area. This proposal seeks to demonstrate that this option is realistic and can deliver 4,500 houses in the period to 2026.</p>	
6909	Little Melton Parish Council say it is completely opposed to our plans. Little Melton produced a Parish Plan in 2006 (based on a survey of all residents) - a large majority of residents want no significant development to occur in the village.	
6948	Woods Hardwick Planning There is the potential to expand in the Rackheath Area in the future due to the availability of land and its location and its improved transport links.	
7021	Easton College The partners are committed to investing to securing a more sustainable and viable settlement. Development at Easton will allow investment in community facilities and the delivery of key worker and student housing to support the College, UEA and the Hospital. It will enable the College to invest and develop the educational facilities to the benefit of Norfolk, the Region and the UK.	



7045	Horsham & Newton St Faith Parish Council This proposal fits neatly into our company's investment strategy which provides for the development of a new business park in the Norwich area within the next five years.	
7126	Thorpe and Felthorpe Trust As a trust, TFT has a long term commitment to the sustainable development of the area. As such their financial models are based on long-term investment as opposed to short-term returns. The TFT and other members of the consortium are committed to achieving a longterm strategy for their land-holdings, which is consistent for good place making and creating a sustainable urban extension in North East Norwich. However, the financial models to deliver this need to be carefully constructed in terms of timescales and yields for the relevant landowners in respect of acquisition of funds, cash flows and anticipated returns.	
7137	Savills (Mr Paul Brighton) Allocation of this broad area for major development will enable an investment strategy to be developed as an integral part a masterplan for the long term sustainability of the new neighbourhoods. Such a strategy will need to encompass the future management arrangements of community facilities and open spaces. The scale of development proposed, including identification of growth beyond the plan period, will provide the landowners and developers confidence to invest for the long term.	
7234	Mr Richard Atkinson We welcome the fact that the option identifies a strategic employment site at Norwich Airport. This is in line with our investment strategy for land north of the Airport, which will maximise the benefits offered by this regionally important facility and the accessible location within the Greater Norwich area. The position of the symbol suggests that the site should lie to the south of the Distributor Road which would be unduly restrictive if the site is to be of a strategic nature.	
7366	I E Homes and Property It will not	
7437	Environment Agency (Eastern Area Office) Within our remit are permissive rights for the maintenance of designated main rivers and the construction of flood defences and control structures. Whilst our work is not directed by local authorities' development frameworks, synergy between our organisations can result in a better outcome for all parties. We therefore recommend that as plans develop and final options are chosen, with timings, phasings, etc. we are kept up-to-date to ensure opportunities for close working are maximised.	
7460	Hethersett Parish Council Will link to the Parish Plan with potential to delay revised local plan until detail of potential development known.	
7561	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Investment The Force is already investing in its 'Long Term Estates Strategy' to replace Police Stations and premises which are not fit for purpose in the County of Norfolk. Additional population growth will place additional demand on capital budgets to provide the required Police infrastructure to support the new communities.	



7577	Norfolk Wildlife Trust Habitat creation initiatives in south Norfolk countryside co-incide with NWT proposals to take forward a "Claylands" Living Landscape Project as part of our Business Plan	
7621	CGMS Ltd (Mr Richard Atkinson) [7681] There would be a strong link with our long term investment strategy which aims to deliver an eco-community at Rackheath. This would make a significant contribution to the identified strategic growth location of 6000 houses in the north-east sector	
7693	Trustees of Beston Estate (Mr Michael Dewing) [7691] This farm estate has been working in detail with Highways (Charles Auger) to facilitate the NNDR central section. Farming operations would be maintained in one block from the airport to Rackheath Church Wood, still centred on Red Hall Farm, Beeston Lane.	
7723	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] There would be no direct link.	
7761	Entec UK (Mr Simon Warner (Wymondham)) [7036] As previously stated the option allocated 4,000 dwellings to Wymondham. Hopkins Homes interests relate to land south of Wymondham, where Hopkins Homes seek to deliver a high quality residential led mixed use scheme, including employment uses, affordable homes, and public open space. Hopkins Homes therefore seek an allocation for this site, within the housing requirements for Wymondham.	
7790	Long Stratton Parish Council (Mrs E Riches) [2029] Will provide a better foundation for additional future residents to 'tap into'	
7817	NHS Norfolk (Deborah Elliott) [7666] This will help to drive our longer term investment strategy.	



Q7. FOR OPTION 1 - Could your organisation commit to support it if it were selected?		
	There were 35 responses to this question. Fifteen say they could commit to support and five are opposed.	
	Issues mentioned include the Water Cycle Study, self-sufficient/ sustainable settlements, and conservation/ green infrastructure. Communities mentioned include Little Melton, Wymondham, Norwich, Mangreen, Swardeston, Mulbarton, Swainthorpe, Sprowston, Rackheath, Attleborough, Thetford, Dereham, Colney Lane and Cringleford.	
6845	Anглиan Water Services Ltd Yes, assuming the Water Cycle Study produces an agreed strategy	
6906	Greenhouse Environment/ Co-op Learning Network We would support a move to make all settlements as self-sufficient in terms of employment and services as possible, thereby reducing commuting which wastes both time and natural resources, and undermines quality of life. To this end, we would tend to oppose further developments of commuter towns and villages in Norwich's rural fringe, but would support limited development in smaller villages if that could be shown to make them more sustainable communities - for example, to become large enough to support a shop and other basic services. We would look for developments in small villages to be undertaken exclusively on the basis of locally controlled Community Land Trusts which would hold the houses and other buildings constructed as an affordable community resource in perpetuity. We would also urge local authorities to work with agencies such as the Village Retail Services Association (part of the Plunkett Foundation - see www.plunkett.co.uk) to provide a funding programme to support the development of community shops	
6910	Little Melton Parish Council Definitely not. It would destroy Little Melton as a village. The proposed new town would effectively be joined to Norwich and would amount to continuous development as far as Wymondham. The town would be too close to Norwich to ever function as an independent town - it would in effect become a suburb of Norwich. Most people recognize the A47 as a sensible limit beyond which there should not be further development of Norwich. We are amazed that a new town should be proposed for this location whilst there is still much uncertainty about the future development of the NRP .Please note that the junction of School Lane and Green Lane in Little Melton is a registered toad and newt crossing (see www.toadwatch.org) - large numbers of toads and great crested newts breed in this area and numbers have been recorded for several years with Froglife and the County amphibian recorder. Any increase in traffic through the village will be strongly resisted.	
6949	Woods Hardwick Planning Yes	



6979/80	<p>Diocese of Norwich In terms of the broad locations for major growth, the Diocese of Norwich support Option 1, as set out within the consultation document. Under options 2 and 3, 2,000 dwellings are proposed at Wymondham in both instances. The Diocese of Norwich consider that Wymondham represents a highly sustainable opportunity for further growth, with the levels of services and facilities provided within the town and its accessibility by public transport justifying the delivery of 4,000 dwellings at Wymondham, rather than the 2,000 dwellings which are proposed under Options 2 and 3. The Diocese of Norwich consider that option 3 is inappropriate, particularly in view of the proposal to locate 4,500 dwellings to the South of Norwich (Mangreen / Swardeston / Mulbarton / Swainthorpe area). Under Option 2 and to a greater extent under Option 1, growth is more sustainably located through extensions to existing urban areas. It is understood that the direction of 4,500 new dwellings to the South of Norwich (Mangreen / Swardeston / Mulbarton / Swainthorpe area) will effectively comprise the establishment of a new settlement. This approach is considered less sustainable than an approach which seeks to direct development to existing settlements owing to the immediate benefit to new housing at existing settlements of existing services, facilities and infrastructure and indeed the support that such growth provides to existing services, facilities and infrastructure</p>	
6999	<p>Barnham Broom Parish Council Yes</p>	
7022	<p>Easton College Yes</p>	
7037	<p>Gerald Eve The Arable Group (TAG) wish to express support for the proposed strategy for growth outlined in Policy 5. TAG consider that land to the North East of Norwich is capable of delivering a significant level of housing provision to contribute to meeting the strategic housing requirement for the Norwich Development Area. TAG welcomes the identification of 6000 new homes to be delivered in the Sprowston/Rackheath Area in all three proposed development options. It is noted however, that the Sprowston/Rackheath Strategic Growth Location for Growth as identified on the Growth Options maps at Appendices 1-3 excludes sites at the settlement boundary to the east of the airport and to the South of the proposed route of the North Norwich Distributor Road, which is assessed in the Strategic Housing Land Availability Assessment (to which separate representations have been made on behalf of TAG). Although it is acknowledged that these maps are illustrative, it is considered important that they are revised to clearly show this area as part of Sprowston/Rackheath Strategic Growth Location.</p>	
7046	<p>Horsham & Newton St Faith Parish Council Unequivocally yes.</p>	
7129	<p>Thorpe and Felthorpe Trust The TFT and emerging consortium is committed to supporting a sustainable urban extension in North East Norwich and is developing the landownership and legal framework to deliver this effectively</p>	



7138	Savills The landowners are committed to working collectively with GNDP and other partners to deliver a vital and viable urban extension at North East Norwich.	
7182	<p>Marks and Spencer Ltd On behalf of our client Marks and Spencer plc (M&S) we set out representations on the recently issued Technical Consultation: Regulation 25 document for the Joint Core Strategy between Broadland District Council, Norwich City Council and South Norfolk Council forming the Greater Norwich Development Partnership (GNDP).</p> <p>M&S operate a store in the City Centre on the corner of Rampant Horse Street and St Stephens. Section 7 of the document deals with "Policies for Places". M&S supports the identification of Norwich city centre as the focus for future retail development (Policy 3), given its role as a regional centre. This conforms with the hierarchy of centres identified in Policy 12 in accordance with PPS6.</p> <p>We also support the objective of enhancing the City Centre's retail function, which can be achieved, in part at least, through an intensification of uses in the primary retail area, and if necessary through expansion.</p>	
7210	Salhouse Parish Council No - it represents over-development of the area.	
7235	Mr Richard Atkinson Yes this would be our favoured option of the three presented	
7298	<p>Breckland District Council This option would need to be mindful of the significant growth planned at Attleborough, Thetford and Dereham and linkages with Norwich in terms of the transport capacity of both the A47 and A11. Breckland Council would be committed to working with the GNDP to explore a wide range of transport solutions along the A11 and A47 corridors given the assertions at pages 14 and 15 that there is net in-commuting from Breckland along the A11 and A47 (specifically Dereham). Additionally, Breckland Council would be committed to working with the GNDP to ensure that energy supply issues to the south and west of Norwich are comprehensively planned and constraints resolved.</p> <p>Please note that similar comments apply to Growth Option 2: Major growth at Hethersett and moderate growth at Wymondham.</p>	
7350	Mr Jim Hamshaw Yes	
7367	I E Homes and Property No and south of NPA needs growth and investment, this option concentrates it away from the south.	
7440	Environment Agency (Eastern Area Office) With all proposed options we are unable to lend direct support, however, our organisation produces, or is involved in, a number of studies that will benefit whichever option is chosen. Studies include Catchment Flood Management Plans, Shoreline Management Plans, the Review of Consents, Greater Norwich WCS, Greater Norwich Green Infrastructure Study (GIS) and the Norwich City Council, Broadland District Council, South Norfolk District Council and Broads Authority SFRAs	



7461	Hethersett Parish Council This option is definitely NOT the preferred option of the Parish Council. However the Parish Council would work with relevant agencies to obtain the best benefit for the village.	
7535	Mr Richard Atkinson Yes, provided that the option is modified to include reference to residential development at Colney Lane/ Cringleford	
7564	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Organisational Support Norfolk Constabulary has a statutory duty to provide a Police service to communities in Norfolk.	
7578	Norfolk Wildlife Trust We would support if the opportunities for green infrastructure and creation of new biodiversity rich landscapes were an integral part of any new developments and if they represent the eco-town target of 40% greenspace	
7600	Thurton Parish Council Yes	
NEW		
7622	CGMS Ltd (Mr Richard Atkinson) [7681] Yes. This would be the favoured option from our point of view, because of the strong cross city links which we are keen to foster -	
7680	Andrew Martin Associates (Goymour Estates) (Mr Michael Clader) [7689] Yes, The land owners and developers have a firm commitment to delivery -	
7694	Trustees of Beston Estate (Mr Michael Dewing) [7691] Yes -	
7724	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] There would be opposition to this option. -	
7755	Colney Parish Council (Mrs H Martin) [1988] The JCS was discussed at the Committee Meeting for Colney Parish on 27th August 2008. There are many good ideas in the document especially those relating to the environment and village communities. However, concerns were expressed that the massive scale development envisaged was based on a Regional Spatial Strategy that was out of date and unsustainable. We therefore cannot support any of the large scale developments proposed and believe that building on this scale would have an adverse impact upon quality of life in the County. -	
7762	Entec UK (Mr Simon Warner (Wymondham)) [7036] Hopkins Homes could support this option with their site to the south of Wymondham. As demonstrated within the supporting document the site is deliverable, available, suitable, and achievable. As a result and given the sites strategic nature, we ask that this site be allocated for development within the Joint Core Strategy in line with guidance in PPS3 and PPS12. -	
7785	Long Stratton Parish Council (Mrs E Riches) [2029] I write to inform you that of the three options put forward, my Council prefers Option 1 • this option being for 'No significant development in Long Stratton. -	
7791	Long Stratton Parish Council (Mrs E Riches) [2029] Yes, but not financially -	
7818	NHS Norfolk (Deborah Elliott) [7666] NHS Norfolk would support the appropriate healthcare developments of whichever option is chosen. -	
7858	Wymondham Town Council (Mr Len Elston) [7708] If option 1 is chosen then, with reluctance and reservations, the Town Council would offer its support to ensure that it would be able to full participate in development proposals. -	



Q8. FOR OPTION 2 - What additional significant infrastructure requirements would there be?		
	There were 37 responses to this question. One says there would be additional significant infrastructure.	
	Issues mentioned include water and wastewater infrastructure, strategic waste management facilities, links to existing infrastructure, new infrastructure, policing, timing of infrastructure, rail links/ infrastructure, cycle paths, high speed internet, more detailed maps, character of Wymondham, conservation/ green infrastructure, flood risk in Norwich city centre, rural hinterland of Norwich, roads and transport provision/ congestion (including A11/ A47/ A140), Long Stratton by-pass, healthcare and leisure facilities. Communities mentioned include Easton, Costessey, Sprowston, Rackheath, Swadesdon, Mulbarton, Swainsthorpe, Bowthorpe Postwick, Trowse, Wymondham, Hethersett, Little Melton, Long Stratton, Norwich, Thurston, Loddon, Chedgrove and Hethel.	
6846	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report. It would appear that option 2 is the second most readily deliverable option taking into account water and wastewater infrastructure requirements, but this should be validated by the Water Cycle Study before final selection.	
6921	Norfolk Environmental Waste Services Strategic Waste Management Facilities	
6930	Thos. Wm. Gaze & Son None	
6950	Woods Hardwick Planning Care should be taken to ensure that there are links to existing infrastructure, housing, and employment sites rather than requiring entirely new infrastructure.	
7023	Easton College Delivering growth in the sub-region is likely to require a significant investment in infrastructure. However, the starting point for any strategy and development must be to manage the impact on existing infrastructure and change travel and consumption behaviours. Our proposals for Easton seek to deliver improvements in non-car facilities and access to Easton College so as to lessen the impact on existing infrastructure such as the A47. The partners are committed to delivering improved access to Easton College, improved pedestrian and cycle links between Easton and the College, improved pedestrian and cycle links to Costessey Park & Ride and implementation of a new shuttle bus linking Easton, the College and Costessey Park & Ride.	
7085	Hevingham Parish Council Doubts over the provision of infrastructure first	



<p>7118</p>	<p>Thorpe and Felthorpe Trust Our clients and adjoining landowners acknowledge the need for new infrastructure to support the growth of the city, including those identified by the Council, which relate to the need for new transport, social and utility/service infrastructure.</p> <p>The delivery of such infrastructure requires the coordination of a range of public sector organisations and the private sector. This is further discussed in our responses to questions 4, 9 and 14 below.</p> <p>Our client's landholdings are adjacent to the agreed route for the Norwich Northern Distributor Road (NNDR). It is acknowledged that the NNDR is a significant piece of the Norwich Area Transport Strategy and will play an important part in supporting major growth. However, it is considered that there are a number of other initiatives that would provide significant improvements to the local transport network and support increased growth in this area.</p> <p>The North East Sector offers the best opportunity to utilise the existing capacity on the underused Bittern Line (the Norwich-Sheringham railway line). The insertion of a rail halt within a new urban extension, linking with the proposed Eco settlement at Rackheath would create a new local rail transit and public transport interchange, linked to the centre of Norwich. This would act to increase transport choice and promote more sustainable modes of transport. It would also increase connectivity to and from existing communities as well as supporting future communities.</p>	
<p>7139</p>	<p>Savills All the major growth locations identified will involve significant investment in infrastructure. In relation to Option 2 we consider that given the likely level of investment in infrastructure the Core Strategy should seek to maximise the amount of development to the North East in order to support that infrastructure and utilise the capacity created. Maximising growth to the North East may also assist in the investigation of further options for sustainable infrastructure, such as the potential for the urban extension to be served by rail services.</p> <p>In planning for major growth to the North East of Norwich we consider that the strategy should identify the overall scale of development to be delivered, including beyond the plan period. This will assist with planning and delivering the infrastructure to ensure that North East Norwich functions as an integrated and sustainable urban extension. The options in the Appendices identify the overall scale of development, but this is not included within the Spatial Vision nor the proposed Core policies. We suggest that both the Spatial Vision and the Core policies should make reference to growth in this location of at least 10,000 homes, of which 6,000 are to be delivered by 2026.</p> <p>We also consider that the Core Strategy should clarify the intentions regarding growth within the NNDR and at Rackheath. We consider that there is scope for a mixed use urban extension of at least 6,000 homes within the area bounded by Wroxham Road, the proposed NNDR and A47 at Postwick over the longer term.</p>	



7211	<p>Salhouse Parish Council Bus services - inadequate at present. Roads - inadequate at present. Cycle paths - inadequate at present. Rail stops - inadequate at present. Sewage and drainage - inadequate at present. Hi-speed internet - inadequate at present.</p>	
7251	<p>Les Brown Associates Should include Trowse</p>	
7278	<p>Bidwells (Harts Farm) Ltd contend that a commercial led mixed use development scheme at East Wymondham (Browick Road) can be delivered within existing infrastructure capacity. Evidence gathered as part of earlier planning proposals in the area (NJP planning application) demonstrates that sufficient infrastructure capacity already exists or can be delivered, to accommodate growth at East Wymondham. In particular, previous evidence accepted by South Norfolk Council in granting permission for the NJP scheme at Browick Road demonstrates that the existing junction onto the A1 has sufficient capacity to accommodate more traffic movements. South Norfolk Council is already aware of this evidence, so it is not re-submitted alongside this representation.</p>	
7319	<p>Norwich Green Party</p> <p>Wymondham. Option 1: 4000 houses. Option 2 & 3: 2000 houses.</p> <p>21. Again, here, the necessity for more detailed maps is apparent as the 'issues and options' document shows development to take place south and south-west of the town, while the Technical Consultation describes planned growth 'predominantly to the south and east of the town'. To the south-west of the town, is the Bay River valley currently protected under ENV13 as a 'Site of regional and local nature conservation interest' and flood risk zone. This, with an adequately proportioned buffer zone, would, one hopes, act as a barrier to westward expansion of development if it occurs as envisaged in the Technical Consultation</p> <p>22. The recent application for 3000 homes by Pelham Holdings for land south of the town shows the kind of issues any development here would be confronted with. Natural England, for instance, launched a strong objection to the proposals pointing them out to be in contravention of the Natural Environment and Rural Communities Act (2006) which, of course, would still take precedence over any new local planning policy. They viewed the development here as being a serious threat to biodiversity, or more specifically, to bats, water voles, otters and great newts in the immediate area. Seven County Wildlife sites are within or close to the development boundary including Silfield Nature Reserve. They also state that 'Of particular concern is the loss of species-rich wet meadows, semi-natural woodland and Important Hedgerows, and the consequent fragmentation and isolation of valuable pockets of habitat across the application site, which will be surrounded by development.'</p> <p>23. Wymondham itself is, of course, an historic market town with its own unique heritage and identity. Development even on the scale proposed in options 2 and 3 would do much to erode the character of the town of which its residents have shown a strong desire to protect. A recent consultation</p>	



	<p>exercise by Wymondham Town Council found that resisting further major development was a key priority of those that took part. It was also widely felt that improvement to services and infrastructure should come ahead of any development and that protection of the natural environment was of prime importance. The Town Council itself has committed to 'protect Wymondham's cultural and historic heritage' and, while favouring the provision of more affordable and special needs homes, foresees the securing of additional housing through small scale development only.</p> <p>24. The other difficulty of development to the south of the town is the dividing effect of the railway line which would make it hard to integrate new housing with the rest of the community and thus further dilute the town's identity.</p>	
7322	<p>Norwich Green Party</p> <p>Hethersett and Little Melton. Option 1 and 2: 4000 houses.</p> <p>25. The area loosely specified in the Technical Consultation appears to extend not as far south as originally shown in 'issues and options' but covers the areas to the north and east of Hethersett encompassing Little Melton. We would concur with some residents' requests that more precise plans are needed to fully assess the proposals.</p> <p>26. We note that much of this area is currently protected under ENV2 which provides for green wedges and forbids 'inappropriate development' which 'would be detrimental to the rural character of the area'. It is precisely that character and the separate identity of the villages which would, of course, be lost with these proposals and which local residents have shown such desire to protect. In the current Local Plan, there is also a strong presumption against development in the Western area of the site as it is deemed vital to maintain the landscape setting of the southern bypass (A47) and to prevent the road being a focus for outward development of the city.</p> <p>27. Right in the middle of the proposed area is a site of local nature conservation interest consisting of 'Braymeadow Bottom' and a succession of small lakes. There is also a County Wildlife Site along the watercourse to the west of Little Melton (south of Low Common) well within the proposed development area. Fragmentation of the surrounding natural environment would, of course, be a threat to their biodiversity. Church Plantation (lying between 2 sites of ancient ruins) and the grounds of Thickthorn Hall, both historic parkland consisting of mixed woods, are on its west and south edges respectively. Large scale development as proposed would be completely detrimental to the setting and damaging to the habitat value of these areas.</p> <p>28. Questions also have to be raised about pressure on the road network particularly given its proximity to the city and the likelihood, for instance, of new roads being used as 'rat runs'. The B1108, already congested to capacity and vital for access to the hospital from the city, would form one of the main routes into town for the new settlement. Concerns have also been raised that the Thickthorn roundabout, which has been described by officers in reports contributing to the strategy as having 'limited or no</p>	



	capacity', would also experience significantly increased traffic.	
7324	<p>Norwich Green Party</p> <p>Long Stratton. Option 2: 2000 homes. Option 3: 1,500 homes.</p> <p>33. This area has the major disadvantage of being the furthest distance from Norwich and without the rail links enjoyed by Wymondham. The town is surrounded by attractive countryside (currently designated under ENV8) which includes two County Wildlife Sites of which Wood Green would possibly be affected by the planned bypass (this is unclear from the map provided). The above proposals represent at least a doubling of the town's households, thus significantly altering its character.</p> <p>34. Although development here would be linked in with the provision of the bypass, it is considered that funding from either Section 106 contributions or the Community Infrastructure Levy (CIL) would be insufficient to meet the expected cost.</p>	
7327	<p>Norwich Green Party</p> <p>West': Costessey & Easton, Options 1 & 2: 2000 homes. Option 3: 1000 homes.</p> <p>35. This largely appears to include land bounded by Bowthorpe to the east and the A47 to the west. Some of this has already been designated for housing growth to which we have no objection but the south of the area appears unsuitable for development being both part of the Bypass Landscape Protection Zone and the Yare Valley. Present policy clearly and place-specifically precludes development here and we would question why it has been considered as an option. Other areas in the North and West of the area at present form part of the 'green wedge'. Woodland immediately to the north of the Dereham Road and the A47 to the West with its attendant protection zone would appear to act as further barriers to development. The protection zone has, for the last 15 years, served the role as defined by the Structure Plan Panel of preserving 'those attributes of the City's natural setting which contribute to its environmental quality'. It is important that this laudable aim is not overridden.</p> <p>36. Although road transport links are good for this site it is important to note it is some distance from railway access</p>	
7368	I E Homes and Property Ltd Highway improvements you have identified and fowl and surface water discharge problems in Wymondham	
7429	<p>Environment Agency (Eastern Area Office) (</p> <p>Provision of green infrastructure forming a coherent scheme across the JCS area should be considered at an early stage. Whilst open/ green spaces can be created within development adequate links and corridors may require more strategic planning.</p> <p>An assumption has been made within stage 2 of the WCS that all sewer networks are at capacity and therefore costs and timings will need to be factored into any future growth.</p>	



	<p>Question 4, Question 9 & Question 14</p> <p>All infrastructure should be in place in time, and where relevant operational, for development. This is as applicable for green infrastructure as for conventional infrastructure. Use of phasing will be important to enable AWS to factor any required improvement works into their business plans.</p> <p>The WCS provides information on the relative constraints of development in the locations proposed we assume that the findings of stage 1 have already been taken into account when deciding on the proposed areas for development and that stage 2a will be used to narrow down the options further.</p> <p>Within Norwich City Centre, flood risk is likely to be the greatest environmental constraint. As discussed above, a level 2a SFRA would help to assess the varying risk across the City Centre and plan around it. We would also support an interdisciplinary approach, for example allocating green spaces to areas unsuitable for built development due to high flood risk. Such an approach may help reduce food risk overall by securing or even improving the provision of floodplain within Norwich.</p>	
7453	<p>Hempnall Parish Council Hempnall Parish Council strongly objects to all three options. The amount of housing development is incompatible with maintaining a rural hinterland to Norwich, something which Hempnall Parish Council considers to be extremely valuable to the county as a whole.</p>	
7462	<p>Hethersett Parish Council Additional roads/ transport provision to enable access to the new development from existing major roads. Current minor roads not suitable for large increase in traffic. consideration should be given to some form of restriction for direct access for traffic and the potential increase in the volume of traffic through existing villages.</p>	
7501	<p>Bidwells It is important to emphasise that the above site has minimal constraints to delivery (questions 4 and 8) and therefore housing provision to meet demand could be brought forward in a relatively short space of time. As stated above, there are not anticipated to be significant infrastructure requirements although the impact upon the Longwater junction - which is expected to be minimal - will need to be confirmed. The site lies within Flood Zone 1 and given the current use of the site as agricultural land, it is not thought that there will be any significant issues in terms of archaeology or contamination. Work is also on-going with Norfolk Wildlife Services with regard to ecology to ensure that these issues are fully addressed once the site comes forward.</p>	
7536	<p>Mr Richard Atkinson The critical infrastructure requirements have been correctly identified plus Long Stratton bypass</p>	
7553	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Infrastructure Requirements All development will require an increase in Police resources.</p> <p>Norfolk Constabulary objects to the current details of significant infrastructure requirements. The scale of development envisaged in the specified areas will have a significant impact on police resources. See response to question 1.</p>	



	<p>The main direct areas of impact relate to increasing the size of Safer Neighbourhood Teams and enhancing Response and Protective Police Services. (Examples of Protective services are Adult and Children Protection and Domestic Violence Units). Other ancillary impacts will be on levels and investigation of serious crime, custody capacity and Norfolk Constabulary's support services.</p> <p>Norfolk Constabulary has serious infrastructure concerns for expanding Police Services at:</p> <p>North East (Sprowston & Rackheath) As Sprowston Police Station on Wroxham Road, Norwich is too small to expand and has temporary buildings on site. New Police premises provision is likely to be required.</p> <p>South West - Hethersett/Little Melton If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>South (Mangreen/Swardesdon/Mulbarton/Swainsthorpe area) If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>Wymondham If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>Please note Norfolk Constabulary objected to the Pelham Holdings Application for 3,000 dwellings on the south side of Wymondham.</p> <p>West (Costessey/Easton area) As Bowthorpe Police Station at Wendene, Bowthorpe, Norwich is too small to expand and has temporary portakabins on site.</p>	
7579	<p>Norfolk Wildlife Trust It should be made clear that extensive new green infrastructure is needed in relation to development between Wymondham and the bypass in addition to that between Hethersett and Wymondham. We assume that this is intended with references to Tiffey valley but it should be made more explicit.</p> <p>If significant growth takes place at Long Stratton, new development will require habitat creation in addition to investment in a green infrastructure corridor. This should include new grassland and woodland to build on existing "natural" green infrastructure of the "claylands" landscape</p>	
7601	<p>Thurton Parish Council Commuters already use the A47/ A146 (impact on Thurston) as a rat run. i.e. commuters from the North East use the A47 to achieve easier access to the city centre in the rush hour. The traffic light phasing at the A47/ A147 junction has to favour those leaving the A47 to avoid tailbacks onto the Southern by-pass. This already causes significant delays to people trying to access Norwich via the A146. Growth of Loddon/Chedgrove will add to this</p> <p>So in Options 2& 3, which envisages growth of Long Stratton, this A47/ A146 junction is likely to also have to absorb vehicles 'rat running' from the A140 too, i.e. from the West as well as the North East.</p>	



<p>7613</p>	<p>Yare Valley Society</p> <p>Options 1 & 2 Pages 66 & 70: South West Sector</p> <p>With regard to the possible major development at Hethersett/Little Melton (Options 1 and 2) we are concerned that it would create pressures for changes to the links with the City. The existing road links and junctions are already overloaded at times and developments already approved or in hand will add to the problems. New large scale developments will create pressures for further major roadworks, potentially damaging to the environment and to the Yare valley in particular.</p>	
<p>7623</p>	<p>CGMS Ltd (Mr Richard Atkinson) [7681] As Q1 plus Long Stratton bypass</p>	
<p>7652</p>	<p>Hempnall Parish Council (Mr I J Nelson) [2014] Hempnall Parish Council strongly objects to all three options. The amount of housing development is incompatible with maintaining a rural hinterland to Norwich, something which Hempnall Parish Council considers to be extremely valuable to the county as a whole.</p>	
<p>7662</p>	<p>Highways Agency (Mrs Davina Galloway) [7624] Option 2</p> <p>Option 2 provides a variation on Option 1 by reducing the scale of the proposed allocation at Wymondham and relocating it to Long Stratton. The same key dependencies are listed in respect of this Option as Option 1</p> <p>Long Stratton is a small market town in the A140 corridor some 11km to the south of the A47 Norwich Southern Bypass. It is linked to Norwich by bus but not by rail and is arguably less able (than, say, Wymondham) to benefit from the provision of non-car modes for trips to and from Norwich. However, it potentially reduces the concentration of development traffic on the critical A1 corridor.</p> <p>Although public transport priority in the A140 corridor (including at the A140/ A47 junction) is listed as a requirement of this Option, no indication is given as to how this will be achieved or whether the A140/ A47 junction has sufficient spare capacity to accommodate it. Indeed, no indication is given as to the ability of this junction to accommodate traffic generated by additional development at Long Stratton and evidence should be sought to substantiate this point.</p> <p>Although Long Stratton is not currently served by rail, the Norwich • Ipswich railway line lies some 2.5 km to the west of the town and historically there was a station at Fornsett which would have allowed Long Stratton residents to access the rail network. It is accepted that the re-introduction of additional local stations on fast inter-city lines is more difficult than on local routes. However, some indication that this possibility has been investigated (and then discounted for sound reasons) should be sought before a major development at Long Stratton is accepted without access to the railway being provided.</p> <p>There is also a possibility that a scaled-down allocation at Wymondham might fail to reach the 'critical mass' to support the level of public transport provision envisaged in Option 1 and that Option 2 might result in a more car-dependent outcome not only at Long Stratton itself but also at Wymondham. This possibility should be investigated.</p>	



7681	Andrew Martin Associates (Goymour Estates) (Mr Michael Clader) [7689] See response to question 3	
7695	Trustees of Beston Estate (Mr Michael Dewing) [7691] Believed to be identified already. Assume that the North East Sector Sprowston/Rackheath growth area would include fields 11-14 and 18-20, south of a line along Beeston Lane.	
7725	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] Again a need for the linking up of the NNDR and the A47. The infrastructure required for this option would make it expensive. infrastructure requirements would there be? -	
7763	Entec UK (Mr Simon Warner (Wymondham)) [7036] The consultation document identifies much of the major infrastructure required to accommodate growth in this option. However, growth option 2 identifies 2,000 dwellings in the Long Stratton Area. Appendix 4 of the Core Strategy Issues and Options stated that: "Long Stratton provides a range of local services and some local job opportunities. It is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time." Where as it stated that: "Wymondham is well related to Norwich and has a wide range of services and jobs. It has the Gateway 11 employment area and is close to the strategic employment site at Hethel. The town is well served by main roads, express buses and has regular and frequent train services to Norwich, Cambridge and beyond. While it is too far from Norwich to walk and, for most people, to cycle, it is small enough to encourage walking and cycling within the town. It appears to be a suitable location for further investigation for strategic growth." Wymondham, which has the necessary infrastructure, should be allocated a higher proportion of growth than proposed in this option.	
7792	Long Stratton Parish Council (Mrs E Riches) [2029] For Option 2 More of all aspects of infrastructure • some improvement to side roads and those bringing in and taking out traffic • provision of footpaths where needed.	
7819	NHS Norfolk (Deborah Elliott) [7666] From the healthcare perspective, with this level of growth, aside from the primary care facilities that are implied in the 3 options, NHS Norfolk would need to consider what additional capacity will be required for community services (ie district nursing, health visiting, midwifery, physio etc) as well as secondary care capacity (including acute and mental health care).	
7840	Scott-Brown Partnership (Mr Steven Scott-Brown) [4310] The Long Stratton By Pass needs to be irrevocably committed before the strategy can deliver 2000 houses. This proposal has been around - on and of - for at least 20 years so its chances of coming forward in a highways capital programme are not great. It is unlikely to be developer funded especially if the normal S106 requirements are expected of the developer.	



7859	Wymondham Town Council (Mr Len Elston) [7708] Provision of either new or enhanced increased leisure facilities for use by all age groups, including youth activities. The provision of sports grounds and pitches together with the upgrading of community halls and the attraction of leisure related businesses is considered a vital infrastructure requirement to support the communities development.	
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Q9. FOR OPTION 2 - What are the constraints to delivery?		
	There were 30 responses to this question. Two say there are no significant constraints.	
	Main issues mentioned include land at Long Stratton bypass, timescales/ infrastructure timing, policing, archaeological sites, coordination of public sector organisations, finance, the planning system, infrastructure in Wymondham, Norwich city centre flood risk, identity of Hethersett, green infrastructure, public transport, traffic infrastructure and healthcare. Communities mentioned include Long Stratton, Rackheath, Easton, Norwich, Colney, Longwater, Harford Bridge, Wymondham, Hethersett, Thorpe End and Long Melton.	
6847	Anглиan Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6931	Thos. Wm. Gaze & Son None, except that the vast majority of the land within the line of the proposed Long Stratton bypass is (or is soon to be) within the control of a single landowner. This makes the scheme potentially deliverable through a developer-funded scheme (depending on the scale of development, and the S106 and CIL costs) without the need for public money. As deliverability is key to the JCS this factor should not be ignored.	
6951	Woods Hardwick Planning A large scale growth location on land that is suitable for development with sustainable transport infrastructure. There is the potential to expand in the Rackheath Area in the future.	
7009	Natural England Option 2 also includes Long Stratton as a strategic growth location. Additional SSSIs at risk from adverse impacts if this option is selected are: Flordon Common SSSI (part of the Norfolk Valley Fens SAC) Fritton Common SSSI Aslacton Parish Land SSSI Forncett Meadows SSSI Pulham Market Big Wood SSSI	
7024	Easton College There are no significant constraints to delivery. The landowners are working together to ensure that development can be brought forward at the earliest opportunity.	
7048	Mr & Mrs L Dale I have noticed little in support of any of the 3 options to show how phased regular supply of building plots can be assured. Surely a very critical consideration, if we are to meet the Government's timescale demands	
7094	Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.	



7121	<p>Thorpe and Felthorpe Trust Building new communities where people wish to live work, study and enjoy requires careful planning, consensus building, and critically, good urban design to create a robust urban and infrastructure framework. It also requires the coordination of a range of public sector organisations and the private sector to facilitate cross sectoral co-operation and ensure that adequate investment is available in order to deliver the necessary infrastructure to support new communities. It is also critical that consideration is given from the outset to planning for viable, economically sustainable infrastructure provision from a revenue perspective.</p> <p>TFT continue to work together with other landowners to develop a comprehensive strategy to promote their land to contribute towards accommodating the future growth of the City. This consortium is a strong starting point in identifying and overcoming constraints in delivering major growth in North East Norwich.</p> <p>Currently, the consortium is looking at models that support the principles of place making, including market leading research that that has been produced jointly by Savills and the Princes Foundation (attached as appendix 1). Such models will require further focus on site specific issues in locating a new settlement in North East Norwich, particularly in relation to timeframes for the delivery of key infrastructure, including the potential imposition of an infrastructure levy and the availability of public funding.</p> <p>The TFT have consistently promoted Enquiry by Design as a planning and design tool, which engages the community, stakeholders, full design team and local interests at the outset of the masterplanning process. This works to resolve issues at the earliest stages of a scheme and quickly proceed towards an optimal area masterplan. The method has demonstrated its credentials at Sherford in South Hams, where an outline planning permission for 5,500 new dwellings; 67,000 square meters of business and commercial space; 16,700 square meters of mixed retail accommodation, community and open space facilities; three primary schools and one secondary school; health care centre; community park; two community wind turbines; a park and ride interchange was achieved in a two year period.</p> <p>A further advantage of the Enquiry by Design route at North East Norwich would be that it would serve to identify the enabling infrastructure requirement for the sustainable urban extension within a relatively short timeframe to underpin feasibility exercises, funding applications and business planning.</p> <p>We attach relevant literature on new models for urbanism (appendix 2), which we aim to utilise in terms of both urban design and financial modelling for the expansion of Norwich. Such modelling will enable us to identify and overcome potential constraints. This will build on the case study of Sherford new settlement, which was identified in our 2006 submission (with the consent of Red Tree, the developer of this settlement).</p>	
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7140	<p>Savills The landowners welcome the Core Strategy looking to 2026. It will be important to demonstrate that not only can growth be delivered over the period to 2026, but that also the RSS requirements for at least 33,000 homes in the Norwich Policy Area over the period 2001 - 2021 can be met.</p> <p>The area at North East Norwich is in multiple ownership. The landowners on whose behalf these representations are submitted are working together to drive the delivery of a significant urban extension in the broad area bounded by Wroxham Road, the proposed NNDR and A47 at the Postwick Interchange.</p> <p>The planning system is also a potential constraint to delivery. The landowners wish to work with the GNDP to move swiftly from an in principle decision regarding the broad location for development, to a site specific proposal and to secure planning permission. This will enable North East Norwich to make a significant contribution towards the need of the sub-region over the plan period and beyond.</p> <p>We see an important element of delivering development at North East Norwich as being the completion of an inner link from Wroxham Road to Broadland Business Park. Part of this will be provided through the already consented development for Persimmon at Blue Boar Lane and The Lothbury Trust is already bringing forward proposals to link Broadland Business Park to Plumstead Road. Completion of this link, as broadly indicated on the attached Plan A, will assist with connectivity and enable commencement of development in a key location close to the urban edge.</p>	
7172	<p>Costco Wholesale UK Ltd The Joint Core Strategy (JCS) indicates that the target for growth in employment is the provision of 35,000 new jobs between 2001 and 2021, and that an employment growth study has been carried out to identify the opportunities required to encourage this growth. In order to achieve the provision of this significant number of jobs the JCS should adopt a flexible, but clear framework in which to guide employment uses. A fundamental part of achieving this is to include a definition within the Core Strategy that provides guidance regarding uses that are appropriate on employment land, thereby protecting employment land from inappropriate uses.</p> <p>The lack of definition of uses appropriate on employment land creates a vague policy framework. This omission could potentially cause conflict in the future and may eventually either allow a range of inappropriate uses or prohibit those employment-generating uses not falling within the 'business use classes'. It would therefore represent a lost opportunity in terms of clarifying suitable employment generation, and provision of employment growth.</p> <p>This representation proposes that a definition of appropriate 'employment uses' is included within the Core Strategy, which also recognises employment generating uses not falling within a use class - sui generis, to ensure that a range of employment uses is encouraged to provide for employment and choice. It is considered that the following definition would be appropriate for 'Employment Land':</p>	



	"All buildings and land which are used or designated for purposes within the Use Class B1, B2 and B8 and closely related sui generis uses (such as warehouse clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates."	
7186	<p>Savills We are of the view that the baseline scenario set out in the Arup Study is the appropriate level at which to plan for job growth and that it can not be the intention of the RSS to limit job growth in the sub-region to below that baseline. Accordingly we agree that the Spatial Vision should be planning to deliver around 33,000 new jobs over the period 2006 - 2026.</p> <p>Whilst we consider the analysis in the Arup Study of job growth and land requirements to be a robust analysis, we consider that the Arup Study places insufficient emphasis on the availability of sites to drive job creation. The focus of the Arup Study appears to be on non-land use measures to deliver growth. We acknowledge the importance of such softer measures, however, we consider that a major element of the strategy must be to ensure that sufficient land is delivered to facilitate the provision of employment floorspace. Indeed, the Arup Study identifies (at para. 1.14) that there is a shortage of available land for development. Given this conclusion we are concerned that the options fail to deliver sufficient sites of the right type in the right location at the right time and that this will be a constraint on development . The strategy is reliant on sites which are constrained and unlikely therefore to deliver, particularly in the short term.</p> <p>Whilst we support growth at Colney, this site is constrained by access and land ownership issues and specifically reserved to meet the needs of the high tech' sector. Studies demonstrate the importance of the growth in high tech' sector and we agree that land should continue to be reserved for such uses. However, as a result there is a need to ensure that the strategy provides for opportunities elsewhere for other economic sectors to grow.</p> <p>We acknowledge the growth of the airport as an important driver of the local economy. However, the Arup Study suggests that this land will be required for uses directly-related to the airport. Such an approach is consistent with the approach previously pursued at Norwich and at other airports. Whilst such an approach supports growth of the economy there is a need to ensure that opportunities exist elsewhere for other non-aviation related businesses to grow. In addition, major growth at the airport will be dependent upon significantly improved access arrangements which are unlikely to be forthcoming in short to medium term.</p> <p>The Arup Employment Study recommends growth at Longwater. This appears to be based on comments in the supporting text in the South Norfolk Local Plan (SNLP) regarding the future potential of such land. The comments in the SNLP do not constitute policy. It is necessary therefore to compare Longwater against other potential locations. The Arup Study does not appear to do this and further consideration needs to be given to the alternative locations for strategic employment provision. The Arup report also contends that Longwater is a good location for further business park activity. This is despite the fact that Longwater has proven to be an</p>	



	<p>unattractive location for such activity over recent years. Longwater was allocated by the SNLP for B1/B2/B8 uses, but is dominated by retail and quasi-retail uses which in turn impacts on the perception of Longwater as a strategic location for industrial, office and warehousing development. No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. Conversely, there is clear evidence that locations south of the City are strongly in demand for industrial, office and warehousing development.</p> <p>In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery. Harford Bridge is strategically located on the southern side of Norwich in an area which business demands as a location. It is well placed to build on the success of the Broadland Business Park as a location and is immediately available for development. The attached masterplan framework document sets out how the site could be developed sensitively to respect the river corridor, to enhance the gateway to Norwich and to help deliver the objectives for public access and habitat recreation in the Yare Valley.</p> <p>Land at Harford Bridge should be allocated by the Core Strategy as an employment allocation.</p>	
7212	Salhouse Parish Council Lack of coordination between agencies.	
7236	Mr Richard Atkinson Programming of infrastructure works Ensuring adequate and timely investment in public transport	
7280	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (N PA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymondham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Pelham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of</p>	



constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.

Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the All trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a



further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development; well connected and well served development; thriving and delivered on time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas, It confirms that landscape and design features can be put in place to mitigate any localised landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymondham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a 'business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology. The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to



	<p>grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 1 1 in Wymondham.</p> <p>A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.</p>	
7369	I E Homes and Property Infrastructure problems in Wymondham	
7432	<p>Environment Agency (Eastern Area Office) All infrastructure should be in place in time, and where relevant operational, for development. This is as applicable for green infrastructure as for conventional infrastructure. Use of phasing will be important to enable AWS to factor any required improvement works into their business plans.</p> <p>The WCS provides information on the relative constraints of development in the locations proposed we assume that the findings of stage 1 have already been taken into account when deciding on the proposed areas for development and that stage 2a will be used to narrow down the options further.</p> <p>Within Norwich City Centre, flood risk is likely to be the greatest environmental constraint. As discussed above, a level 2a SFRA would help to assess the varying risk across the City Centre and plan around it. We would also support an interdisciplinary approach, for example allocating green spaces to areas unsuitable for built development due to high flood risk. Such an approach may help reduce food risk overall by securing or even improving the provision of floodplain within Norwich.</p>	
7463	Hethersett Parish Council Change in government policy. Housing market volatility. Erosion of green belt and open countryside. It is essential that Hethersett maintains its own identity.	
7537	Mr Richard Atkinson Programming of infrastructure works Ensuring adequate and timely investment in public transport	
7556	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Constraints to Delivery Norfolk Constabulary will require capital funding via the community levy scheme to provide additional Police infrastructure to growth areas.	



7580	Norfolk Wildlife Trust Regarding green infrastructure to the West, the Yare Valley and Bawburgh Lakes already have high biodiversity value and it will be critical to retain this value if there is increased public access to these areas. The evidence for this can be found in the number of County Wildlife Sites in the area whose value is maintained through management that seeks to zone areas for wildlife and for public access. In contrast Bawburgh Pits CWS currently provides a secluded wildlife area with limited public access and careful development would be required to ensure that increased access did not harm the biodiversity value of this area.	
7624	CGMS Ltd (Mr Richard Atkinson) [7681] Programming of infrastructure works Ensuring adequate and timely investment in public transport	
7682	Andrew Martin Associates (Goymour Estates) (Mr Michael Clader) [7689] See response to question 4	
7696	Trustees of Beston Estate (Mr Michael Dewing) [7691] Early development would be possible provided that all land west of A1151 is treated as a discrete part of the Growth sector, and is not held back by being required to form a single Masterplan exercise with the Rackheath/Thorpe End main parts.	
7726	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] If this option was taken without a link between the NNDR and the A47 amount of traffic generated trying to access north of Norwich would be unsustainable.	
7764	Entec UK (Mr Simon Warner (Wymondham)) [7036] Hethersett, Long Melton and Long Stratton are unable to accommodate the proposed levels of growth. As a result further allocations should be made in Wymondham where growth can be comfortably accommodated.	
7793	Long Stratton Parish Council (Mrs E Riches) [2029] . Definatly would need employment, as otherwise with large scale development and commuting, it would soon be back to transport problems!	
7820	NHS Norfolk (Deborah Elliott) [7666] This option would create additional jobs in the health sector. A major constraint to delivery could be availability of appropriately skilled staff in the primary, community and secondary healthcare sectors.	
7841	Scott-Brown Partnership (Mr Steven Scott-Brown) [4310] The By Pass. It is very unlikely that this site can make an early contribution to meeting housing requirements.	
7860	Wymondham Town Council (Mr Len Elston) [7708] If development is spread over a number of sites throughout the Town there will be additional pressure on existing services including highways, drainage and water supplies. There will inevitably be congestion on the existing road network.	



Q10. FOR OPTION 2 - What opportunities does this option present?	
	There were 31 responses to this question.
	Issues mentioned include Long Stratton bypass, road infrastructure, sustainable transport infrastructure, homes and community facilities, cross working between public sector organisations, integrating home with jobs, community infrastructure, investment in South NPA, new green spaces, and a cross-city development corridor. Communities mentioned include Long Stratton, Rackheath, Easton, Norwich, Wymondham, Hethersett, Little Melton, Costessey and Thickthorn.
6848	Anглиan Water Services Ltd Refer to Water Cycle Study Stage 2A report
6932	Thos. Wm. Gaze & Son A bypass at Long Stratton would relieve the single largest bottleneck on a major route between Ipswich and Norwich, bringing wider benefits to the region through improved transport links, both for private and commercial traffic, and providing a key link between the GNDP policy area and the Haven Gateway.
6952	Woods Hardwick Planning A large scale growth location on land that is suitable for development with sustainable transport infrastructure. There is the potential to expand in the Rackheath Area in the future.
7026	Easton College This option supports the growth of Easton, the delivery of more affordable homes for local people at Easton and the development of improved community facilities, including village hall, recreational space, and transport services.
7124	<p>Thorpe and Felthorpe Trust The focus for TFT and the consortium is to integrate new homes with jobs and community infrastructure within a sustainable urban footprint and critically to link these key land uses and infrastructure with existing city fringe neighbourhoods as well as future communities to enhance amenity, sustainability and quality of life for all. The creation of a new urban extension in North East Norwich provides the opportunity to achieve this, while at the same time creating significant new capacity within the city for growth which will serve to enhance and compliment the historic core of the city. The sustainable urban extension will be comprised of vibrant, self-sustaining communities which are integral to the city but which do not place an undue pressure on the historic core and existing civic infrastructure. Rather they develop as a new, attractive place in their own right.</p> <p>In addition it will create the opportunities for:</p> <ul style="list-style-type: none"> • Improved connectivity between the city and 'fringe' communities; • Promoting sustainable modes of transport and creating 'walkable' neighbourhoods; • Enhancing and maintaining important landscape features and biodiversity, which are important for informal recreation, health and well-being; • The creation of more jobs and better access to employment opportunities;



	<ul style="list-style-type: none"> • Delivering a choice of high quality housing within distinctive neighbourhoods; • Innovative urban design which creates a sense of place; • Increased services and facilities to serve local communities (both established and new); • Sustainable design and construction which encourages healthy, environmentally conscious lifestyles and reduces carbon dependency. 	
7141	<p>Savills This option enables the GNDP to take a long term strategic view concerning the direction of growth for Norwich. We consider that this Core Strategy should put in place an approach which will endure beyond the end of the Plan period. The appendices to the consultation document clarify that the options for North East Norwich involve longer term expansion beyond 2026 for at least 10,000 homes in total. With that in mind we consider that the Core Strategy should explicitly identify North East Norwich as an area of major growth for the plan period and beyond of at least 10,000, with 6,000 homes to be delivered by 2026. Putting in place this longer term strategy will assist in masterplanning new neighbourhoods and developing an infrastructure strategy.</p> <p>The option will enable further masterplanning work to be put in place for an integrated mixed use urban extension to Norwich based on the principles of walkable neighbourhoods and to plan strategically for the range of facilities needed by new communities, from education to transport to shopping and recreation. As part of that masterplanning we envisage the creation of a major new neighbourhood along Salhouse Road, close to the existing urban edge, including the provision of a district centre and significant new housing.</p> <p>The Option will enable the completion of an inner link from Wroxham Road to Broadland Business Park to improve connectivity and assist with delivery of new housing in a key location close to the urban edge. It will also enable further development of ideas for significant environmental enhancements and to contribute to the Green Infrastructure Strategy through measures such as heathland recreation.</p>	
7153	<p>Norwich Consolidated Charities</p> <p>4. HOUSING</p> <p>4.1. We endorse the observation at paragraph 8.4 of the Technical Consultation that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 23,200 dwellings in the NPA in the period to 2026.</p> <p>4.2. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward</p>	



	<p>pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.</p> <p>4.3. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change.</p>	
7173	<p>Costco Wholesale UK Ltd The provision of a suitable employment definition would allow appropriate employment uses to locate with the Strategic Employment Locations and would therefore stimulate and encourage suitable growth within these areas. This representation is submitted on behalf of Costco Wholesale UK Ltd (Costco) who operate a number of wholesale warehouse clubs throughout the country, typically located on employment land. Costco operates sui generis membership warehouses and was created to serve the wholesaling needs of the small to medium sized business owner. At Costco, businesses can purchase products at wholesale prices, which are significantly lower than those of traditional sources of distribution. Businesses can obtain most of their inventory needs from under one roof. Each warehouse sells a wide range of products, although the variety within each product range is limited. This enables Costco Wholesale to serve a wide range of businesses, providing a core range of products at low prices.</p> <p>Costco is a reputable employer and would benefit the Broadland, Norwich and South Norfolk area by offering a range of employment opportunities to local people. The level of jobs provided by Costco compares favourably in employment density levels to traditional B Class Uses. The company provides local people with a broad range of quality jobs that reflect the unique nature of Costco's operations. In addition there would be indirect job creation through the support given to small local businesses.</p> <p>Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training.</p>	



	<p>The benefits of a warehouse club such as Costco are that the positive impacts spread throughout the local economy. Costco's target customer is the small and medium businesses and many of these can be found in town centres. They include;</p> <ul style="list-style-type: none"> • Independent Retailers • Food and drink outlets such as restaurants and sandwich shops • Service outlets such as small estate agents, accountants, garages and professional firms • Independently owned hotels, guest houses etc <p>Costco can therefore make a significant contribution to the health of the local economy and, particularly to small businesses that are otherwise forced to pay a premium for small purchases from traditional wholesale sources. Costco's prices and its range of products are unique in this respect.</p> <p>The potential positive benefits of a Costco were the subject of an independent report by CB Hillier Parker of October 2000 "Costco Warehouse Clubs: An assessment of Economic Impacts". The report, enclosed, confirms the substantial cost savings potentially available to local businesses as well as the significant penetration, which Costco achieves of local business memberships. 78% of members questioned in the study agreed that Costco's low prices help them retain competitive and the study drew the conclusion that:</p> <p>"...significant positive impacts would benefit local economies from the development of a Costco warehouse. (para. 6.10)"</p> <p>The construction of a Costco in the Broadland, Norwich and South Norfolk area would bring a number of benefits to small businesses and the wider economy in terms of employment generation for both a skilled and unskilled workforce. It is therefore important that provision is made within the JCS for a policy by which an application for a warehouse club and other sui generis uses acceptable on employment land could be assessed.</p>	
7188	<p>Savills For the reasons outlined under Question 9 the option is likely to fail to realise the economic opportunity that the RSS growth strategy has put in place for the Norwich sub-region. In terms of employment growth therefore it represents a missed opportunity</p>	
7197	<p>Persimmon Homes In relation to Wymondham, this option offers a strategy that spreads the new development around the town in a larger number of smaller developments and therefore presents the opportunity of less risk of delay and better use of existing infrastructure, whilst offering the opportunity to share the costs of any essential new infrastructure between various developers. The much shorter lead in period and spread of site and developers would also mean that it would be possible to take full advantage in due course of an improved housing market to achieve the delivery of the required increase in housing.</p>	



7213	Salhouse Parish Council Major improvements to the items listed in Q3.	
7237	Mr Richard Atkinson The option would create a strong cross-city development corridor which would support high quality road- and rail-based public transport, making the best use of existing resources	
7269	<p>Bidwells the locations for major change and development in the Norwich Policy Area), Option 1 or 2 is strongly preferred over Option 3. Hethersett/Little Melton is situated very close to Norwich and nearby centres of activity, including Norwich Research Park, University of East Anglia, Norfolk and Norwich University Hospital, Wymondham and the Longwater Employment Area. It is located on the A11, is very close to Thickthorn Park & Ride site and has fast and frequent bus connections to Norwich and Wymondham. Hethersett therefore enjoys excellent public transport (bus) links to Norwich city centre, first-class road links (for freight and car travel) along the A11 corridor and (via Wymondham train station) good rail links to Norwich and Cambridge. The village also has a good range of shops and services meeting everyday needs.</p> <p>Bidwells and Gladedale (Anglia) Ltd have already undertaken a considerable amount of work promoting Hethersett/ Little Melton as a strategic growth location and initial investigations (e.g. on utility services, healthcare, education and the natural environment) have highlighted the strengths of the location, as well as identifying challenges to overcome.</p>	
7281	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymondham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peigham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment</p>	



Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

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The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development;



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The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymond ham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites,



	<p>including Gateway 11 in Wymondham.</p> <p>A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.</p>	
7370	<p>I E Homes and Property Investment in southern part of NPA which is much needed to avoid concentration in north and west. South NPA currently being over looked despite A140.</p>	
7435	<p>Environment Agency (Eastern Area Office) There are opportunities for new, planned green spaces, links and corridors. This would improve biodiversity and in some cases may create new wildlife habitat. There is an opportunity to improve water resource and waste water treatment provision, moving away from a reliance on old sewer networks, many of which are combined surface and foul water.</p>	
7464	<p>Hethersett Parish Council Additional employment to the area. extra leisure facilities. Additional affordable housing. Possible sixth form college. New medical centre. Completion of cycleway to Wymondham.</p>	
7502	<p>Bidwells The site is in single ownership and Mr Green is committed to bringing development forward as soon as possible. Therefore when looking at the opportunities provided by Options 1 and 2 (questions 5 and 10), given the lack of constraints it is clear that this site could potentially make a rapid contribution in the early years of the Plan to the provision of 2000 dwellings. Larger sites in Costessey are likely to have more significant infrastructure requirements and potentially other issues to be overcome before development can commence, so delivering high levels of housing growth in the early years of the Plan is likely to place reliance on smaller sites coming forward, such as Mr Green's.</p> <p>It is considered that development of Mr Green's site has significant benefits, as it is situated very close to Norwich and nearby centres of activity including Norwich Research Park, University of East Anglia, Norfolk and Norwich University Hospital, Wymondham and the Longwater Employment Area. It is located on the All and close to the Thickthorn Park & Ride site enjoying excellent public transport (bus) links to Norwich City Centre. These advantages are also shared by the significant growth proposed for Hethersett/ Little Melton under options 1 and 2 and therefore Mr Green supports strongly the choice of either Option 1 or Option 2 (questions 7 and 12).</p>	
7538	<p>Mr Richard Atkinson The option would create a strong cross-city development corridor which would support high quality road- and rail-based public transport, making the best use of existing resources.</p>	
7559	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Opportunities</p> <p>Norfolk Constabulary considers that growth will provide the opportunity for greater cross working between public service providers to share new infrastructure (sites) to mitigate the cost impact to services and the public.</p>	



<p>7581</p>	<p>Norfolk Wildlife Trust The opportunity to create new biodiversity rich landscapes to link with existing areas such as the Broads and South Norfolk landscape of commons and woodlands.</p> <p>It should be made clear that habitat creation in the north-east sector will encompass parkland, grassland and woodland in addition to heathland. Heathland was the main historic component of this area but habitat creation will need to include other habitats particularly in those areas outside of the historic boundary of Mousehold Heath (as shown in Fadens maps of 1797).</p> <p>In order to provide further access opportunities and to take the pressure off habitats in the Yare valley bottom (see question 9), it is important that green infrastructure in this area should include the valley slopes and include woodland, grassland and former heathland habitats.</p>	
<p>7625</p>	<p>CGMS Ltd (Mr Richard Atkinson The option would create a strong cross-city development corridor which would support high quality road- and rail-based public transport,. However the reduced growth at Wymondham could limit the development of rail based solutions making the best use of existing resources</p>	
<p>7683</p>	<p>Andrew Martin Associates (Goymour Estates) (Mr Michael Clader) See response to question 5</p>	
<p>7697</p>	<p>Trustees of Beston Estate (Mr Michael Dewing) [7691] Farm ownership and occupation interests can both enable an early phased development in conjunction with Norfolk CC land, and assumed to be required in 2010-16.</p> <p>The land is adjacent to the existing urban area utilities and facilities, with public transport. The landscape compartments and retention of historic parkland framework in this sub-area tend to favour a development form as an extension of the urban area, rather than being part of a contiguous Rackheath new town.</p>	
<p>7727</p>	<p>Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] Limited. The amount of investment in restricted existing environments at Easton, Wymondham and Hethersett make this an unviable option.</p> <p>The opportunities to create a new town at Long Stratton appear to have been overlooked but would surely be the most cost effective.</p>	
<p>7765</p>	<p>Entec UK (Mr Simon Warner (Wymondham)) [7036] The option currently allocates 2,000 new homes in Wymondham, this should be increased, based on the Joint Core Strategy evidence base. Wymondham is well connected locations, with a range of social infrastructure, employment and retail to accommodate growth. Further growth at Wymondham would allow the required growth to be fully accommodated in a settlement within the Norwich Policy Area.</p>	



7794	Long Stratton Parish Council (Mrs E Riches) [2029] Great if the funding is there to provide all required, if not leave things alone!!	
7821	NHS Norfolk (Deborah Elliott) [7666] This option presents the opportunity to review and plan strategically for the health needs of the Greater Norwich Area over the next 15 - 20 years.	
7861	Wymondham Town Council (Mr Len Elston) [7708] Options 2 & 3 suggest 2,000 new homes rather than the 4,000•5,000 outlined under option 1i and the reduction in new residents will make it easier to assimilate them into the Town's life and culture. It would also prevent a new separate settlement being formed.	



Q11. FOR OPTION 2 - How will this link with your longer term investment strategies?		
	There were 23 responses to this question. One response says it is completely opposed to its plans.	
	Issues raised include development in Little Melton, future growth, sustainable settlement, policing, development of educational facilities, flood defences and habitat creation. Communities mentioned include Little Melton, Rackheath, Easton, Norwich, Wymondham, Tasburgh, Long Stratton, Colney and Hethersett.	
6849	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6912	Little Melton Parish Council It is completely opposed to our plans. Little Melton produced a Parish Plan in 2006 (based on a survey of all residents) - a large majority of residents want no significant development to occur in the village.	
6933	Thos. Wm. Gaze & Son It will provide an important growth point in the region.	
6953	Woods Hardwick Planning There is the potential to expand in the Rackheath Area in the future due to the availability of land and its location.	
7027	Easton College The partners are committed to investing to securing a more sustainable and viable settlement. Development at Easton will allow investment in community facilities and the delivery of key worker and student housing to support the College, UEA and the Hospital. It will enable the College to invest and develop the educational facilities to the benefit of Norfolk, the Region and the UK.	
7127	Thorpe and Felthorpe Trust As a trust, TFT has a long term commitment to the sustainable development of the area. As such their financial models are based on long-term investment as opposed to short-term returns. The TFT and other members of the consortium are committed to achieving a longterm strategy for their land-holdings, which is consistent for good place making and creating a sustainable urban extension in North East Norwich. However, the financial models to deliver this need to be carefully constructed in terms of timescales and yields for the relevant landowners in respect of acquisition of funds, cash flows and anticipated returns.	
7142	Savills Allocation of this broad area for major development will enable an investment strategy to be developed as an integral part a masterplan for the long term sustainability of the new neighbourhoods. Such a strategy will need to encompass the future management arrangements of community facilities and open spaces. The scale of development proposed, including identification of growth beyond the plan period, will provide the landowners and developers confidence to invest for the long term.	



7198	<p>Persimmon Homes Persimmon Homes Anglia have an interest in a 9 hectare site at Norwich Common, Wymondham, which offers the opportunity to provide some 300 dwellings on a site close to existing employment opportunities, very well served by existing services and facilities and with good pedestrian, cycle and public transport links to the town centre and to Norwich. They are actively promoting this site through the LDF and SHLAA processes. It would be their intention to develop this site at the earliest opportunity.</p>	
7238	<p>Mr Richard Atkinson We welcome the fact that the option identifies a strategic employment site at Norwich Airport. This is in line with our investment strategy for land north of the Airport, which will maximise the benefits offered by this regionally important facility and the accessible location within the Greater Norwich area. The position of the symbol suggests that the site should lie to the south of the Distributor Road which would be unduly restrictive if the site is to be of a strategic nature.</p>	
7282	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymond ham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peigham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area,</p>	



particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & BidweNs, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the A1 trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development; well connected and well served development; thriving and delivered on time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards



the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas, It confirms that landscape and design features can be put in place to mitigate any localised landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymondham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 11 in Wymondham.

A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations



	Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.	
7371	I E Homes and Property Ltd We have housing and employment land fronting the A140 in Tasburgh which is brownfield and available for development. This presents opportunities if Long Stratton takes growth.	
7438	Environment Agency (Eastern Area Office) Within our remit are permissive rights for the maintenance of designated main rivers and the construction of flood defences and control structures. Whilst our work is not directed by local authorities' development frameworks, synergy between our organisations can result in a better outcome for all parties. We therefore recommend that as plans develop and final options are chosen, with timings, phasings, etc. we are kept up-to-date to ensure opportunities for close working are maximised.	
7465	Hethersett Parish Council Will link to the Parish Plan with potential to delay revised local plan until detail of potential development known.	
7539	Mr Richard Atkinson While we welcome the fact that the option identifies a strategic employment site at Colney, the option is unclear about the scale of residential development which could take place at Colney Lane and which would benefit from the education and employment opportunities available at this location and the high quality public transport links which the strategy would promote. Our investment strategy for Colney Lane is intended to maximise these benefits and could complement the proposed development at Hethersett	
7562	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Investment The Force is already investing in its 'Long Term Estates Strategy' to replace Police Stations and premises which are not fit for purpose in the County of Norfolk. Additional population growth will place additional demand on capital budgets to provide the required Police infrastructure to support the new communities.	
7582	Norfolk Wildlife Trust Habitat creation initiatives in south Norfolk countryside co-incide with NWT proposals to take forward a Claylands Living Landscape Project as part of our Business Plan	
7626	CGMS Ltd (Mr Richard Atkinson) [7681] There would be a strong link with our long term investment strategy which aims to deliver an eco-community at Rackheath. This would make a significant contribution to the identified strategic growth location of 6000 houses in the north-east sector -	
7698	Trustees of Beston Estate (Mr Michael Dewing) [7691] This farm estate has been working in detail with Highways (Charles Auger) to facilitate the NDR central section. Farming operations would be maintained in one block from the airport to Rackheath Church Wood, still centred on Red Hall Farm. -	
7729	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] There would be no direct link. -	



7766	Entec UK (Mr Simon Warner (Wymondham)) [7036] As previously stated the option allocated 2,000 dwellings in Wymondham. Hopkins Homes interests relate to land south of Wymondham, at which Hopkins Homes seeks to deliver a high quality residential led mixed use scheme, including employment uses, affordable homes, and public open space. Hopkins Homes seek an allocation for this site within the housing requirements for Wymondham. -	
7795	Long Stratton Parish Council (Mrs E Riches) [2029] Could perhaps combine with other villages in some ways -	
7822	NHS Norfolk (Deborah Elliott) [7666] This will help to drive our longer term investment strategy.	



Q12. FOR OPTION 2 - Could your organisation commit to support it if it were selected?		
	There were 23 responses to this question. Eleven could commit to support it. Five could not.	
	Issues mentioned include employment, urbanisation of rural South Norfolk, rural roads, conservation, sustainability, housing provision, over development, and green infrastructure. Communities mentioned include East Carenton, Ketteringham, Mangreen, Little Melton, Wymondham, Swardeston, Mulbarton, Swainthorpe, Norwich, Sprowston, Rackheath, Hethersett and Cringleford.	
6850	Anglian Water Services Ltd Yes, assuming the Water Cycle Study produces an agreed strategy	
6897	East Carleton Parish Council East Carenton & Ketteringham Parish Council has reviewed the above document and is concerned that all of the options offered are based on the assumption of new jobs being brought into the area and it is unclear where these jobs are actually going to come from. Both the insurance and finance sectors seem to be downsizing even before the recent problems with the major companies out sourcing many of their operations to off shore cheaper employers. This would seem to undermine the basis for much of the predicted growth in the Joint Core Strategy. However, given that a plan needs to be formulated for future growth either organic or forced; from the options given option 2 would seem to be the least objectionable proposal. The Parish Council is completely opposed to the urbanisation of the rural areas in South Norfolk and all of the proposed options would promote this undesirable position. The proposed development at Mangreen is of particular concern as it is difficult to see how a new town could be created with a separate identity. It is so close to Norwich city centre it would almost merge with the existing urban sprawl and it goes against the Parish's opposition to urbanisation of the green belt currently in place in this area. Whilst the infrastructure is being addressed in the plan by upgrading main access roads, local traffic does tend to use country roads as cut throughs. Any restrictions to curtail such cut throughs would then have a negative impact on exiting residents. It is difficult to see how the current population of Norfolk will not be adversely affected by the adoption of any of the 3 options for large scale development.	
6911	Little Melton Parish Council Definitely not. It would destroy Little Melton as a village. The proposed new town would effectively be joined to Norwich and would amount to continuous development as far as Wymondham. The town would be too close to Norwich to ever function as an independent town - it would in effect become a suburb of Norwich. Most people recognize the A47 as a sensible limit beyond which there should not be further development of Norwich. We are amazed that a new town should be proposed for this location whilst there is still much uncertainty about the future development of the NRP .Please note that the junction of School Lane and Green Lane in Little Melton is a registered toad and newt crossing (see www.toadwatch.org) - large numbers of toads and great crested newts breed in this area and numbers have been	



	recorded for several years with Froglife and the County amphibian recorder. Any increase in traffic through the village will be strongly resisted.	
6934	Thos. Wm. Gaze & Son Yes	
6954	Woods Hardwick Planning Yes	
6981/2	Diocese of Norwich In terms of the broad locations for major growth, the Diocese of Norwich support Option 1, as set out within the consultation document. Under options 2 and 3, 2,000 dwellings are proposed at Wymondham in both instances. The Diocese of Norwich consider that Wymondham represents a highly sustainable opportunity for further growth, with the levels of services and facilities provided within the town and its accessibility by public transport justifying the delivery of 4,000 dwellings at Wymondham, rather than the 2,000 dwellings which are proposed under Options 2 and 3. The Diocese of Norwich consider that option 3 is inappropriate, particularly in view of the proposal to locate 4,500 dwellings to the South of Norwich (Mangreen / Swardeston / Mulbarton / Swainthorpe area). Under Option 2 and to a greater extent under Option 1, growth is more sustainably located through extensions to existing urban areas. It is understood that the direction of 4,500 new dwellings to the South of Norwich (Mangreen / Swardeston / Mulbarton / Swainthorpe area) will effectively comprise the establishment of a new settlement. This approach is considered less sustainable than an approach which seeks to direct development to existing settlements owing to the immediate benefit to new housing at existing settlements of existing services, facilities and infrastructure and indeed the support that such growth provides to existing services, facilities and infrastructure.	
7028	Easton College yes	
7038	Gerald Eve The Arable Group (TAG) wish to express support for the proposed strategy for growth outlined in Policy 5. TAG consider that land to the North East of Norwich is capable of delivering a significant level of housing provision to contribute to meeting the strategic housing requirement for the Norwich Development Area. TAG welcomes the identification of 6000 new homes to be delivered in the Sprowston/ Rackheath Area in all three proposed development options. It is noted however, that the Sprowston/ Rackheath Strategic Growth Location for Growth in the as identified on the Growth Options maps at Appendices 1-3 excludes sites at the settlement boundary to the east of the airport and to the South of the proposed route of the North Norwich Distributor Road, which is assessed in the Strategic Housing Land Availability Assessment (to which separate representations have been made on behalf of TAG). Although it is acknowledged that these maps are illustrative, it is considered important that they are revised to clearly show this area as part of Sprowston/ Rackheath Strategic Growth Location.	
7108	Tesco Stores Ltd No	
7130	Thorpe and Felthorpe Trust The TFT and emerging consortium is committed to supporting a sustainable urban extension in North East Norwich and is developing the landownership and legal framework to deliver this effectively	



7143	Savills The landowners are committed to working collectively with GNDP and other partners to deliver a vital and viable urban extension at North East Norwich.	
7201	Persimmon Homes Yes	
7214	Salhouse Parish Council No - it represents over-development of the area	
7239	Mr Richard Atkinson Yes	
7283	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymond ham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peigham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is</p>	



questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & BidweNs, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the A1 trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development; well connected and well served development; thriving and delivered on time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas. It confirms that landscape and design features can be put in place to mitigate any localised



landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymondham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 11 in Wymondham.

A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.



7372	I E Homes and Property Yes.	
7441	Environment Agency (Eastern Area Office) With all proposed options we are unable to lend direct support, however, our organisation produces, or is involved in, a number of studies that will benefit whichever option is chosen. Studies include Catchment Flood Management Plans, Shoreline Management Plans, the Review of Consents, Greater Norwich WCS, Greater Norwich Green Infrastructure Study (GIS) and the Norwich City Council, Broadland District Council, South Norfolk District Council and Broads Authority SFRAs	
7466	Hethersett Parish Council This option is definitely NOT the preferred option of the Parish Council. However the Parish Council would work with relevant agencies to obtain the best benefit for the village.	
7540	Mr Richard Atkinson Yes, provided that the option is modified to include reference to residential development at Colney Lane/ Cringleford	
7565	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Organisational Support Norfolk Constabulary has a statutory duty to provide a Police service to communities in Norfolk.	
7583	Norfolk Wildlife Trust We would support if the opportunities for green infrastructure and creation of new biodiversity rich landscapes were an integral part of any new developments and if they represent eco-town target of 40% greenspace.	
7603	Thurton Parish Council No	
7627	CGMS Ltd (Mr Richard Atkinson) [7681] Yes	
7684	Andrew Martin Associates (Goymour Estates) (Mr Michael Clader) [7689] Yes, The land owners and developers have a firm commitment to delivery	
7699	Trustees of Beston Estate (Mr Michael Dewing) [7691] Yes selected? -	
7730	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] There would be less opposition to this option.	
7753	Colney Parish Council (Mrs H Martin) [1988] The JCS was discussed at the Committee Meeting for Colney Parish on 27th August 2008. There are many good ideas in the document especially those relating to the environment and village communities. However, concerns were expressed that the massive scale development envisaged was based on a Regional Spatial Strategy that was out of date and unsustainable. We therefore cannot support any of the large scale developments proposed and believe that building on this scale would have an adverse impact upon quality of life in the County.	
7767	Entec UK (Mr Simon Warner (Wymondham)) [7036] Whilst it our belief that Wymondham can accommodate a much greater amount development than is proposed within this option, Hopkins Homes site at South of Wymondham could help deliver the required housing growth in Wymondham. As demonstrated within the supporting document the site is deliverable, available, suitable, and achievable. As a result and given the sites strategic nature, we ask that this site be allocated for development within the Joint Core Strategy in line worth guidance in PPS3 and PPS12.	



7796	Long Stratton Parish Council (Mrs E Riches) [2029] Would not be able to say until it was known that there would be funding	
7823	NHS Norfolk (Deborah Elliott) [7666] NHS Norfolk would support the appropriate healthcare developments of whichever option is chosen.	
7862	Wymondham Town Council (Mr Len Elston) [7708] If option 2 is chosen then, whilst mitigating the pressure on the Town as opposed to option 1 the Town Council would still have reservations but would offer its support to ensure that it would be able to full participate in development proposals.	



Q13. FOR OPTION 3 - What additional significant infrastructure requirements would there be?	
	There were 41 responses to this question. One says there are no additional significant infrastructure requirements.
	Issues mentioned include water and wastewater infrastructure, strategic waste management facilities, links to existing infrastructure, reduced opportunities for walking, cycling and public transport, policing, retail provision, coordination of public services, high-speed internet access, more detailed maps, loss of countryside, scale of development, drainage in Wymondham, green infrastructure, Norwich city centre flood risk, the rural hinterland of Norwich, traffic/ transport infrastructure and healthcare. Communities mentioned include Easton, Sprowston, Rackheath, Swadesdon, Hethersett, Mulbarton, Swainsthorpe, Bowthorpe, Mangreen, Harford Bridge, Norwich, Postwick, Trowse, Wymondham, Long Stratton, Costessey, and Hethel..
6851	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report. It would appear that option 3 is the least deliverable option taking into account water and wastewater infrastructure requirements, but this should be validated by the Water Cycle Study before final selection.
6922	Norfolk Environmental Waste Services Strategic Waste Management Facilities
6935	Thos. Wm. Gaze & Son None
6955	Woods Hardwick Planning Care should be taken to ensure that there are links to existing infrastructure, housing, and employment sites rather than requiring entirely new infrastructure.
7029	Easton College The option potentially risks creating a more dispersed pattern of development, which in turn could put a greater strain on infrastructure and require greater investment. As such it may reduce the opportunities for walking, cycling and public transport such as those offered by development at Easton.
7086	Hevingham Parish Council Doubts over the provision of infrastructure first
7109	<p>Tesco Stores Ltd North East (Sprowston / Rackheath Area) With regards to the planned growth to the north east - at least 6000 dwellings (rising to a total of at least 10,000 dwellings after 2026)" (Appendix Three), additional retail provision would be needed to serve the proposed residents.</p> <ul style="list-style-type: none"> • MapInfo data states that the national average annual convenience goods expenditure is £3831 per household in 2005. The additional 6000 dwellings would therefore generate approximately £23m worth of annual convenience goods expenditure which should be accommodated locally.



	<ul style="list-style-type: none">• MapInfo data states that the national average annual comparison goods expenditure is £6845 per household in 2005. The additional 6000 dwellings would therefore generate approximately £41m worth of annual comparison goods expenditure. It is appreciated that Norwich City Centre has a strong comparison retail function; therefore a large proportion of this generated expenditure should be directed towards new comparison retail in Norwich City Centre. Nevertheless, there is also a need to provide day-to-day lower order and middle order comparison goods locally - about £15m (and perhaps up to £20m) worth of annual expenditure is considered realistic. <p>Additional retail floorspace will be required to accommodate this additional expenditure. It would appear logical for the planned district centre at Sprowston to serve a majority of the local need for services/facilities generated by the additional 6000 households. It would be sensible to provide the necessary additional floorspace in this location and in part as part of the existing Tesco store as the centre exists and already has good transport links.</p> <p>South (Mangreen / Swardeston / Mulbarton / Swainsthorpe Area) The intention is to create a "high street" designed to serve the locality without drawing trade from a wider area. In order to prevent trade draw from wider areas, convenience provision would have to be sufficiently small i.e. less than 1000m². A store this size would be able to provide for the top-up convenience shopping needs of the new town, but would not be able to provide for main food shopping needs - the product ranges would not be sufficiently broad, and the store would not be able to hold sufficient stock. The residents would therefore need to travel further afield.</p> <ul style="list-style-type: none">• Mapinfo data states that the national average annual convenience goods expenditure is £3831 per household in 2005. The additional 4500 dwellings would therefore generate approximately £17m worth of annual convenience goods expenditure. It is a general rule of thumb that 70% of convenience expenditure is for main food shopping (30% accounts for top-up shopping) - this does however depend on the location. Therefore approximately £12m of main food shopping expenditure will be generated.• Mapinfo data states that the national average annual comparison goods expenditure is £6845 per household in 2005. The additional 4500 dwellings would therefore generate approximately £31m worth of annual comparison goods expenditure. A proportion of this expenditure will be on day-to-day lower order and middle order comparison goods. Much of this should be accommodated in new, local facilities or enhanced existing local facilities <p>The Tesco store at Harford Bridge is the closest superstore which can provide a main food shopping function. It is expected that the majority of these new households would visit this store for this purpose. The Core Strategy should recognise that there will be a need to enhance existing local provision.</p>	
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7119	<p>Thorpe and Felthorpe Trust Our clients and adjoining landowners acknowledge the need for new infrastructure to support the growth of the city, including those identified by the Council, which relate to the need for new transport, social and utility/service infrastructure. The delivery of such infrastructure requires the coordination of a range of public sector organisations and the private sector. This is further discussed in our responses to questions 4, 9 and 14 below.</p> <p>Our client's landholdings are adjacent to the agreed route for the Norwich Northern Distributor Road (NNDR). It is acknowledged that the NNDR is a significant piece of the Norwich Area Transport Strategy and will play an important part in supporting major growth. However, it is considered that there are a number of other initiatives that would provide significant improvements to the local transport network and support increased growth in this area. The North East Sector offers the best opportunity to utilise the existing capacity on the underused Bittern Line (the Norwich-Sheringham railway line). The insertion of a rail halt within a new urban extension, linking with the proposed Eco settlement at Rackheath would create a new local rail transit and public transport interchange, linked to the centre of Norwich.</p> <p>This would act to increase transport choice and promote more sustainable modes of transport. It would also increase connectivity to and from existing communities as well as supporting future communities.</p>	
7144	<p>Savills All the major growth locations identified will involve significant investment in infrastructure. In relation to Option 3 we consider that given the likely level of investment in infrastructure the Core Strategy should seek to maximise the amount of development to the North East in order to support that infrastructure and utilise the capacity created. Maximising growth to the North East may also assist in the investigation of further options for sustainable infrastructure, such as the potential for the urban extension to be served by rail services.</p> <p>In planning for major growth to the North East of Norwich we consider that the strategy should identify the overall scale of development to be delivered, including beyond the plan period. This will assist with planning and delivering the infrastructure to ensure that North East Norwich functions as an integrated and sustainable urban extension. The options in the Appendices identify the overall scale of development, but this is not included within the Spatial Vision nor the proposed Core policies. We suggest that both the Spatial Vision and the Core policies should make reference to growth in this location of at least 10,000 homes, of which 6,000 are to be delivered by 2026.</p> <p>We also consider that the Core Strategy should clarify the intentions regarding growth within the NNDR and at Rackheath. We consider that there is scope for a mixed use urban extension of at least 6,000 homes within the area bounded by Wroxham Road, the proposed NNDR and A47 at Postwick over the longer term.</p>	



7215	<p>Salhouse Parish Council Bus services - inadequate at present. Roads - inadequate at present. Cycle paths - inadequate at present. Rail stops - inadequate at present. Sewage and drainage - inadequate at present. Hi-speed internet - inadequate at present.</p>	
7252	<p>Les Brown Associates Should include Trowse</p>	
7284	<p>Bidwells (Harts Farm) Ltd contend that a commercial led mixed use development scheme at East Wymondham (Browick Road) can be delivered within existing infrastructure capacity. Evidence gathered as part of earlier planning proposals in the area (NJP planning application) demonstrates that sufficient infrastructure capacity already exists or can be delivered, to accommodate growth at East Wymondham. In particular, previous evidence accepted by South Norfolk Council in granting permission for the NJP scheme at Browick Road demonstrates that the existing junction onto the A11 has sufficient capacity to accommodate more traffic movements. South Norfolk Council is already aware of this evidence, so it is not re-submitted alongside this representation.</p>	
7320	<p>Norwich Green Party</p> <p>Wymondham. Option 1: 4000 houses. Option 2 & 3: 2000 houses.</p> <p>21. Again, here, the necessity for more detailed maps is apparent as the 'issues and options' document shows development to take place south and south-west of the town, while the Technical Consultation describes planned growth 'predominantly to the south and east of the town'. To the south-west of the town, is the Bay River valley currently protected under ENV13 as a 'Site of regional and local nature conservation interest' and flood risk zone. This, with an adequately proportioned buffer zone, would, one hopes, act as a barrier to westward expansion of development if it occurs as envisaged in the Technical Consultation</p> <p>22. The recent application for 3000 homes by Pelham Holdings for land south of the town shows the kind of issues any development here would be confronted with. Natural England, for instance, launched a strong objection to the proposals pointing them out to be in contravention of the Natural Environment and Rural Communities Act (2006) which, of course, would still take precedence over any new local planning policy. They viewed the development here as being a serious threat to biodiversity, or more specifically, to bats, water voles, otters and great newts in the immediate area. Seven County Wildlife sites are within or close to the development boundary including Silfield Nature Reserve. They also state that 'Of particular concern is the loss of species-rich wet meadows, semi-natural woodland and Important Hedgerows, and the consequent fragmentation and isolation of valuable pockets of habitat across the application site, which will be surrounded by development.'</p> <p>23. Wymondham itself is, of course, an historic market town with its own</p>	



	<p>unique heritage and identity. Development even on the scale proposed in options 2 and 3 would do much to erode the character of the town of which its residents have shown a strong desire to protect. A recent consultation exercise by Wymondham Town Council found that resisting further major development was a key priority of those that took part. It was also widely felt that improvement to services and infrastructure should come ahead of any development and that protection of the natural environment was of prime importance. The Town Council itself has committed to 'protect Wymondham's cultural and historic heritage' and, while favouring the provision of more affordable and special needs homes, foresees the securing of additional housing through small scale development only.</p> <p>24. The other difficulty of development to the south of the town is the dividing effect of the railway line which would make it hard to integrate new housing with the rest of the community and thus further dilute the town's identity.</p>	
<p>7323</p>	<p>Norwich Green Party</p> <p>Mangreen, Swardeston, Mulbarton and Swainsthorpe. Option 3: 4,500 houses.</p> <p>29. The development of this area would represent a significant loss to Norfolk of a quiet and very attractive rural area in relative close proximity to the city. Its hedgerows, patches of woodland and pretty villages give the area a particularly unique charm.</p> <p>30. The area is bordered by several significant County Wildlife Sites largely consisting of mixed woodland and a series of small lakes in the East Carleton area to the West, and to the East the Tas River Valley incorporating the woods and grounds of Dunston Hall. The preservation of the setting and nature value of these areas must be considered of paramount importance and immediately poses problems for any planned development. Both Swardeston and Mulbarton are also characterised by very large commons providing valuable amenity space and grassland habitats. The rural context of these areas, along with Mangreen Hall and Bowthorpe Manor, contributes significantly to their character and would be completely destroyed with development on this scale.</p> <p>31. I would argue strongly that this area in particular represents Norfolk countryside at its best and that any development here should be very limited in scope.</p> <p>32. Further, although there is an adjacent railway line, no station appears to be planned. It has also to be pointed out that improvements to roads and public transport infrastructure as envisaged could run to approx £55M.</p>	
<p>7325</p>	<p>Norwich Green Party</p> <p>Long Stratton. Option 2: 2000 homes. Option 3: 1,500 homes.</p> <p>33. This area has the major disadvantage of being the furthest distance from Norwich and without the rail links enjoyed by Wymondham. The town is surrounded by attractive countryside (currently designated under ENV8) which includes two County Wildlife Sites of which Wood Green would possibly be affected by the planned bypass (this is unclear from the map provided). The above proposals represent at least a doubling of the town's households, thus significantly altering its character.</p>	



	<p>34. Although development here would be linked in with the provision of the bypass, it is considered that funding from either Section 106 contributions or the Community Infrastructure Levy (CIL) would be insufficient to meet the expected cost.</p>	
7328	<p>Norwich Green Party</p> <p>West': Costessey & Easton, Options 1 & 2: 2000 homes. Option 3: 1000 homes.</p> <p>35. This largely appears to include land bounded by Bowthorpe to the east and the A47 to the west. Some of this has already been designated for housing growth to which we have no objection but the south of the area appears unsuitable for development being both part of the Bypass Landscape Protection Zone and the Yare Valley. Present policy clearly and place-specifically precludes development here and we would question why it has been considered as an option. Other areas in the North and West of the area at present form part of the 'green wedge'. Woodland immediately to the north of the Dereham Road and the A47 to the West with its attendant protection zone would appear to act as further barriers to development. The protection zone has, for the last 15 years, served the role as defined by the Structure Plan Panel of preserving 'those attributes of the City's natural setting which contribute to its environmental quality'. It is important that this laudable aim is not overridden.</p> <p>36. Although road transport links are good for this site it is important to note it is some distance from railway access</p>	
7331	<p>North Norfolk District Council NNDC note the proposed allocation in the north east sector of Norwich which will impact on North Norfolk and would wish to be involved in any cross border issues that arise.</p>	
7333	<p>Pelham Holdings Ltd Pelham Holdings Ltd generally support Option 3 of the strategy. However, they reserve the right to provide further supporting evidence on this and any other issue that may affect the Joint Core Strategy as a result of the GNDP publishing further reports on technical studies supporting the emerging Core Strategy.</p>	
7341	<p>Swardeston Parish Council I am writing on behalf of Swardeston Parish Council . Once again , as per the Issues and Options consultation it has not been practicable to gain consensus and respond to each individual question as a Parish Council. However the Parish Council wish to record their issues as follows:-</p> <ul style="list-style-type: none"> • Policy 5 - Locations for major change and development in the Norwich policy area <p>The Parish Council wish to record their strongest objections to option 3 which includes 4,500 homes in the South area described as Mangreen/ Swardeston/ Mulbarton/ Swainsthorpe.</p> <ul style="list-style-type: none"> • There is a concern with potential flooding due to the reduction in green land due to the major building work proposed, to absorb rainfall. • There is also mention of managing traffic to reduce impact on the small country roads however in practice people will use these roads as they choose causing problems for existing residents. To manage these could result in a deterioration of access for people already located in the area and failure to manage it would cause excessive traffic on rural roads already overused as cut throughs. 	



	<ul style="list-style-type: none"> • It is impossible to see any advantages to the creation of so many homes • The proposal of a new town, with a distinct identity, so close to Norwich is completely unreasonable as it would be difficult, if not impossible to generate such identity because of it's proximity to the main city. The two entities would almost merge and we believe that it would simply be seen as a characterless Norwich suburb. • The creation of a high street so close to the city centre and a large supermarket is impracticable and is likely to make the sustainability of shops difficult. • The creation of a business park in this area again is a concern as there is no indication of where the businesses are likely to come from. In the wider context there is no indication other than vague messages of where 36,000 will manage to be created. Much of the growth appears to be built around attracting more companies from the financial and insurance sectors to the area. However the existing financial companies are reducing their work forces on a regular basis with many of their jobs being moved offshore leaving many existing Norwich residents struggling to find suitable high grade work. • The Parish Council previously responded to the issues and options consultation earlier this year and recorded that they are sceptical about the need for this scale of development or the creation of this high number of new jobs. They accept that there needs to be a strategy in place if the need should arise but believe that all 3 options offered all have their issues. Swardeston Parish Council however completely object to the proposal of option 3 which would affect the quality of life for our residents and change the entire rural environment of it and the surrounding small villages. 	
7345	<p>Pelham Holdings Ltd Pelham Holdings Ltd generally support Option 3 of the strategy. However, they reserve the right to provide further supporting evidence on this and any other issue that may affect the Joint Core Strategy as a result of the GNDP publishing further reports on technical studies supporting the emerging Core Strategy.</p>	
7373	<p>I E Homes and Property Dealing with drainage overcapacity in Wymondham</p>	
7430	<p>Environment Agency (Eastern Area Office) Provision of green infrastructure forming a coherent scheme across the JCS area should be considered at an early stage. Whilst open/ green spaces can be created within development adequate links and corridors may require more strategic planning.</p> <p>An assumption has been made within stage 2 of the WCS that all sewer networks are at capacity and therefore costs and timings will need to be factored into any future growth.</p> <p>Question 4, Question 9 & Question 14</p> <p>All infrastructure should be in place in time, and where relevant operational, for development. This is as applicable for green infrastructure as for conventional infrastructure. Use of phasing will be important to enable AWS to factor any required improvement works into their business plans.</p> <p>The WCS provides information on the relative constraints of development in the locations proposed we assume that the findings of stage 1 have already been taken into account when deciding on the proposed areas for</p>	



	<p>development and that stage 2a will be used to narrow down the options further.</p> <p>Within Norwich City Centre, flood risk is likely to be the greatest environmental constraint. As discussed above, a level 2a SFRA would help to assess the varying risk across the City Centre and plan around it. We would also support an interdisciplinary approach, for example allocating green spaces to areas unsuitable for built development due to high flood risk. Such an approach may help reduce food risk overall by securing or even improving the provision of floodplain within Norwich.</p>	
7454	<p>Hempnall Parish Council Hempnall Parish Council strongly objects to all three options. The amount of housing development is incompatible with maintaining a rural hinterland to Norwich, something which Hempnall Parish Council considers to be extremely valuable to the county as a whole.</p>	
7467	<p>Hethersett Parish Council Refer to answers for Q.22 to 25</p>	
7503	<p>Bidwells</p> <p>Option3 Bidwells, on behalf of Mr Green, has already undertaken a considerable amount of work assessing Costessey, and a considerable amount of work has been expended (both by the GNDP and also by landowners) in the consideration of Hethersett / Little Melton as a strategic growth location. There appears to have been very little background work undertaken on the Mangreen/ Swardeston/ Mulbarton/ Swainsthorpe area (questions 13-17), as this is the first time this potential site has appeared in the Joint Core Strategy. There are a number of unanswered questions and lack of published evidence in respect of the area's ability to contribute to delivery of housing in the Norwich Policy Area at the rates anticipated in the East of England Plan. In conclusion, Mr Green believes that Costessey/ Easton is well placed to deliver 2000 homes (rather than the 1000 proposed under Option 3) and Hethersett/ Little Melton has the best chance of providing a sustainable community capable of delivering housing at the rates required to make a significant contribution to the NPA's housing target for the plan period.</p> <p>Options 3 is therefore an inappropriate choice and is not supported by Mr Green.</p>	
7541	<p>Mr Richard Atkinson The critical infrastructure requirements have been correctly identified plus Long Stratton bypass</p>	
7554	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] All development will require an increase in Police resources.</p> <p>Norfolk Constabulary objects to the current details of significant infrastructure requirements. The scale of development envisaged in the specified areas will have a significant impact on police resources. See response to question 1.</p> <p>The main direct areas of impact relate to increasing the size of Safer Neighbourhood Teams and enhancing Response and Protective Police Services. (Examples of Protective services are Adult and Children Protection and Domestic Violence Units).</p>	



	<p>Other ancillary impacts will be on levels and investigation of serious crime, custody capacity and Norfolk Constabulary's support services.</p> <p>Norfolk Constabulary has serious infrastructure concerns for expanding Police Services at:</p> <p>North East (Sprowston & Rackheath) As Sprowston Police Station on Wroxham Road, Norwich is too small to expand and has temporary buildings on site. New Police premises provision is likely to be required.</p> <p>South West - Hetherset/Little Melton If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>South (Mangreen/Swardesdon/Mulbarton/Swainsthorpe area) If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>Wymondham If this area becomes a major growth location then additional resources will be required for the Safer Neighbourhood Team.</p> <p>Please note Norfolk Constabulary objected to the Pelham Holdings Application for 3,000 dwellings on the south side of Wymondham.</p> <p>West (Costessey/Easton area) As Bowthorpe Police Station at Wendene, Bowthorpe, Norwich is too small to expand and has temporary portakabins on site.</p>	
7584	<p>Norfolk Wildlife Trust It should be made clear that extensive new green infrastructure is needed in relation to development between Wymondham and the bypass in addition to that between Hetherset and Wymondham. We assume that this is intended with references to Tiffey valley but it should be made more explicit.</p> <p>If significant growth takes place at Long Stratton or in the South sector (Mangreen etc), new development will require habitat creation in addition to investment in a green infrastructure corridor. This should include new grassland and woodland to build on existing "natural" green infrastructure of the "claylands" landscape of this area.</p>	
7602	<p>Thurton Parish Council Commuters already use the A47/ A146 (impact on Thurston) as a rat run. i.e. commuters from the North East use the A47 to achieve easier access to the city centre in the rush hour. The traffic light phasing at the A47/ A147 junction has to favour those leaving the A47 to avoid tailbacks onto the Southern by-pass. This already causes significant delays to people trying to access Norwich via the A146. Growth of Loddon/ Chedgrove will add to this</p> <p>So in Options 2& 3, which envisages growth of Long Stratton, this A47/ A146 junction is likely to also have to absorb vehicles 'rat running' from the A140 too, i.e. from the West as well as the North East.</p>	
7628	<p>CGMS Ltd (Mr Richard Atkinson) [7681] As Q1 plus Long Stratton bypass</p>	



7653	<p>Hempnall Parish Council (Mr I J Nelson) [2014] Hempnall Parish Council strongly objects to all three options. The amount of housing development is incompatible with maintaining a rural hinterland to Norwich, something which Hempnall Parish Council considers to be extremely valuable to the county as a whole.</p>	
7663	<p>Highways Agency (Mrs Davina Galloway) [7624] Option 3 Option 3 provides a more radical alternative, replacing the proposed new settlement based on Hethersett with an alternative new settlement in the Mulbarton, Swardeston, Swainsthorpe and Mangreen area. This area is located immediately to the south of the A47/ A140 Harford junction and the key dependencies for option 3 identify a significant highway improvement as being required at this junction. The Highways Agency agrees with this view. The proposals for the Mulbarton area include a 50 Ha Business Park 'to ensure access to the A140 and A47'. Given the location of this facility, it is unclear what measures will be available to ensure that this does not become a predominantly car-dependent facility. The business park should be located and designed to ensure strong linkages with the residential component of the site, and with the proposed bus rapid transit corridor to the city centre. This area lies alongside the Norwich to Ipswich railway line and approximately 2km to the south of the Norwich • Cambridge line. The potential for providing new rail halt(s) such as are proposed at Rackheath and at Broadland Business Park should be investigated, to supplement the proposed bus priority link along Ipswich Road. In general, Option 3 appears slightly less able to benefit from strategic links to non-car modes of travel than Option 1. However, by dispersing development away from the critical All corridor and by acknowledging the need to upgrade the A47/ A140 junction, this option might provide a more balanced set of impacts upon the Trunk Road network. Evidence to support this view should be provided if Option 3 is intended to be a serious alternative to Options 1 and 2. Overall, the Joint Core Strategy for Broadland, Norwich and South Norfolk is positive for the Highways Agency as growth will be concentrated in existing areas such as Norwich City Centre and Wymondham, which will have the effect of generating jobs and other services, thereby reducing the need to travel. The Joint Core Strategy acknowledges the need to improve key Trunk Road junctions. However, no indication is given as to the scale of these improvements and their feasibility. The Highways Agency welcomes the concept of developing a bus based rapid transit network. The Highways Agency also welcomes new rail halts at Rackheath and Broadland Business Park, although no indication is given as to how far these proposals have been tested with the rail industry.</p> <p>C - 7663 - 7624 - Q13. FOR OPTION 3 - What additional significant infrastructure requirements would there be? -</p>	
7685	<p>Andrew Martin Associates (Goymour Estates) (Mr Michael Clader) [7689] The Royal Norwich Golf Club Site (see attached plan ref: 08074/01). The usual infrastructure associated with a development of this size would be required. With regard to transport infrastructure, it is recognised that Drayton Road suffers congestion at peak times. However, it should be</p>	



	<p>noted that various junction improvements have been undertaken by the Council. These coupled with the proposed Norwich Northern Distributor Road will improve the traffic in the vicinity of the site. Assessments will be undertaken with regard to the impact of the proposed development and appropriate mitigation measures will be implemented.</p> <p>It is understood that the existing foul drainage system through Norwich is assumed to be at capacity and flows from development in this area would have to pass through Norwich. The Greater Norwich Water Cycle Study will investigate this further and examine whether other alternative treatment sites are required. We will also be liaising with the Environment Agency to ensure that this issue is addressed.</p>	
7700	<p>Trustees of Beston Estate (Mr Michael Dewing) [7691] Believed to be identified already.</p> <p>Assume that the North East Sector Sprowston/Rackheath growth area would include fields 11-14 and 18-20, south of a line along Beeston Lane.</p>	
7731	<p>Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] Again a need for the linking up of the NNDR and the A47. The infrastructure required for this option would make it expensive.</p>	
7768	<p>Entec UK (Mr Simon Warner (Wymondham)) [7036] The consultation document identifies much of the major infrastructure required to accommodate growth in this option. However, growth option 3 identifies 1,500 dwellings in the Long Stratton Area.</p> <p>As previously stated the Appendix 4 of the Core Strategy Issues and Options stated that:</p> <p>"Long Stratton provides a range of local services and some local job opportunities. It is poorly related to strategic employment sites. Even with a bypass, road access and public transport accessibility to Norwich or to the south is poor. This might constrain employment growth in the village. It does not appear to be a suitable location for further investigation for strategic growth at this time."</p> <p>Where as it stated that:</p> <p>"Wymondham is well related to Norwich and has a wide range of services and jobs. It has the Gateway 11 employment area and is close to the strategic employment site at Hethel. The town is well served by main roads, express buses and has regular and frequent train services to Norwich, Cambridge and beyond. While it is too far from Norwich to walk and, for most people, to cycle, it is small enough to encourage walking and cycling within the town. It appears to be a suitable location for further investigation for strategic growth."</p>	
7797	<p>Long Stratton Parish Council (Mrs E Riches) [2029] Option 3 - Even more need than in respect of Option 2.</p>	
7824	<p>NHS Norfolk (Deborah Elliott) [7666]</p> <p>From the healthcare perspective, with this level of growth, aside from the primary care facilities that are implied in the 3 options, NHS Norfolk would need to consider what additional capacity will be required for community services (ie district nursing, health visiting, midwifery, physio etc) as well as secondary care capacity (including acute and mental health care).</p>	



7842	Scott-Brown Partnership (Mr Steven Scott-Brown) [4310] For Long Stratton - the commitment to build a By Pass which given the smaller number of houses would be even more dependent on public finance.	
7863	Wymondham Town Council (Mr Len Elston) [7708] Options 2 & 3 suggest 2,000 new homes rather than the 4,000•5,000 outlined under optioni and the reduction in new residents will make it easier to assimilate them into the Town's life and culture. It would also prevent a new separate settlement being formed.	



Q14. FOR OPTION 3 - What are the constraints to delivery?		
	There are 30 responses to this question.	
	Issues mentioned include funding of Long Stratton bypass, sustainable transport infrastructure, protecting and enhancing biodiversity, strain on infrastructure, cost, timescales/ timing, policing, archaeological sites, the planning system, coordination between agencies, jobs and employment provision, traffic/road infrastructure and healthcare. Communities mentioned include Long Stratton, Rackheath, Mangreen, Swardeston, Mulbarton, Swainsthorpe, Norwich, Colney, Longwater, Harford Bridge, Wymondham and Thorpe End.	
6852	Anглиan Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6936	Thos. Wm. Gaze & Son The scale of development proposed may not be sufficient to deliver a 100% developer-funded bypass for Long Stratton. However we will continue to work with the GNDP on the feasibility of a developer-led scheme.	
6956	Woods Hardwick Planning A large scale growth location on land that is suitable for development with sustainable transport infrastructure. There is the potential to expand in the Rackheath Area in the future	
7010	Natural England Additional growth in the Mangreen/ Swardeston/ Mulbarton/ Swainsthorpe area would not impact directly on any nationally designated sites, but the caveat about protecting and enhancing biodiversity in the wider environment remains pertinent.	
7030	Easton College The strategy risks placing a greater strain on infrastructure, potentially adding cost and reducing the opportunity for delivering high quality, environmentally responsible developments.	
7049	Mr & Mrs L Dale I have noticed little in support of any of the 3 options to show how phased regular supply of building plots can be assured. Surely a very critical consideration, if we are to meet the Government's timescale demands	
7095	Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.	
7122	Thorpe and Felthorpe Trust Building new communities where people wish to live work, study and enjoy requires careful planning, consensus building, and critically, good urban design to create a robust urban and infrastructure framework. It also requires the coordination of a range of public sector organisations and the private sector to facilitate cross sectoral co-operation and ensure that adequate investment is available in order to deliver the necessary infrastructure to support new communities. It is also critical that consideration is given from the outset to planning for viable, economically sustainable infrastructure provision from a revenue	



	<p>perspective.</p> <p>TFT continue to work together with other landowners to develop a comprehensive strategy to promote their land to contribute towards accommodating the future growth of the City. This consortium is a strong starting point in identifying and overcoming constraints in delivering major growth in North East Norwich. Currently, the consortium is looking at models that support the principles of place making, including market leading research that has been produced jointly by Savills and the Princes Foundation (attached as appendix 1). Such models will require further focus on site specific issues in locating a new settlement in North East Norwich, particularly in relation to timeframes for the delivery of key infrastructure, including the potential imposition of an infrastructure levy and the availability of public funding.</p> <p>The TFT have consistently promoted Enquiry by Design as a planning and design tool, which engages the community, stakeholders, full design team and local interests at the outset of the masterplanning process. This works to resolve issues at the earliest stages of a scheme and quickly proceed towards an optimal area masterplan. The method has demonstrated its credentials at Sherford in South Hams, where an outline planning permission for 5,500 new dwellings; 67,000 square meters of business and commercial space; 16,700 square meters of mixed retail accommodation, community and open space facilities; three primary schools and one secondary school; health care centre; community park; two community wind turbines; a park and ride interchange was achieved in a two year period.</p> <p>A further advantage of the Enquiry by Design route at North East Norwich would be that it would serve to identify the enabling infrastructure requirement for the sustainable urban extension within a relatively short timeframe to underpin feasibility exercises, funding applications and business planning.</p> <p>We attach relevant literature on new models for urbanism (appendix 2), which we aim to utilise in terms of both urban design and financial modelling for the expansion of Norwich. Such modelling will enable us to identify and overcome potential constraints. This will build on the case study of Sherford new settlement, which was identified in our 2006 submission (with the consent of Red Tree, the developer of this settlement).</p>	
<p>7145</p>	<p>Savills The landowners welcome the Core Strategy looking to 2026. It will be important to demonstrate that not only can growth be delivered over the period to 2026, but that also the RSS requirements for at least 33,000 homes in the Norwich Policy Area over the period 2001 - 2021 can be met.</p> <p>The area at North East Norwich is in multiple ownership. The landowners on whose behalf these representations are submitted are working together to drive the delivery of a significant urban extension in the broad area bounded by Wroxham Road, the proposed NNDR and A47 at the Postwick Interchange.</p> <p>The planning system is also a potential constraint to delivery. The landowners wish to work with the GNDDP to move swiftly from an in principle decision regarding the broad location for development, to a site specific proposal and to secure planning permission. This will enable</p>	



	<p>North East Norwich to make a significant contribution towards the need of the sub-region over the plan period and beyond.</p> <p>We see an important element of delivering development at North East Norwich as being the completion of an inner link from Wroxham Road to Broadland Business Park. Part of this will be provided through the already consented development for Persimmon at Blue Boar Lane and The Lothbury Trust is already bringing forward proposals to link Broadland Business Park to Plumstead Road. Completion of this link, as broadly indicated on the attached Plan A, will assist with connectivity and enable commencement of development in a key location close to the urban edge.</p>	
7174	<p>Costco Wholesale UK Ltd The Joint Core Strategy (JCS) indicates that the target for growth in employment is the provision of 35,000 new jobs between 2001 and 2021, and that an employment growth study has been carried out to identify the opportunities required to encourage this growth. In order to achieve the provision of this significant number of jobs the JCS should adopt a flexible, but clear framework in which to guide employment uses. A fundamental part of achieving this is to include a definition within the Core Strategy that provides guidance regarding uses that are appropriate on employment land, thereby protecting employment land from inappropriate uses.</p> <p>The lack of definition of uses appropriate on employment land creates a vague policy framework. This omission could potentially cause conflict in the future and may eventually either allow a range of inappropriate uses or prohibit those employment-generating uses not falling within the 'business use classes'. It would therefore represent a lost opportunity in terms of clarifying suitable employment generation, and provision of employment growth.</p> <p>This representation proposes that a definition of appropriate 'employment uses' is included within the Core Strategy, which also recognises employment generating uses not falling within a use class - sui generis, to ensure that a range of employment uses is encouraged to provide for employment and choice. It is considered that the following definition would be appropriate for 'Employment Land'</p> <p>All buildings and land which are used or designated for purposes within the Use Class B1, B2 and B8 and closely related sui generis uses (such as warehouse clubs, cash and carry businesses and builders merchants) which are commonly found in industrial estates."</p>	
7189	<p>Savills We are of the view that the baseline scenario set out in the Arup Study is the appropriate level at which to plan for job growth and that it can not be the intention of the RSS to limit job growth in the sub-region to below that baseline. Accordingly we agree that the Spatial Vision should be planning to deliver around 33,000 new jobs over the period 2006 - 2026.</p> <p>Whilst we consider the analysis in the Arup Study of job growth and land requirements to be a robust analysis, we consider that the Arup Study places insufficient emphasis on the availability of sites to drive job creation. The focus of the Arup Study appears to be on non-land use measures to deliver growth. We acknowledge the importance of such</p>	



softer measures, however, we consider that a major element of the strategy must be to ensure that sufficient land is delivered to facilitate the provision of employment floorspace. Indeed, the Arup Study identifies (at para. 1.14) that there is a shortage of available land for development. Given this conclusion we are concerned that the options fail to deliver sufficient sites of the right type in the right location at the right time and that this will be a constraint on development. The strategy is reliant on sites which are constrained and unlikely therefore to deliver, particularly in the short term.

Whilst we support growth at Colney, this site is constrained by access and land ownership issues and specifically reserved to meet the needs of the high tech' sector. Studies demonstrate the importance of the growth in high tech' sector and we agree that land should continue to be reserved for such uses. However, as a result there is a need to ensure that the strategy provides for opportunities elsewhere for other economic sectors to grow.

We acknowledge the growth of the airport as an important driver of the local economy. However, the Arup Study suggests that this land will be required for uses directly-related to the airport. Such an approach is consistent with the approach previously pursued at Norwich and at other airports. Whilst such an approach supports growth of the economy there is a need to ensure that opportunities exist elsewhere for other non-aviation related businesses to grow. In addition, major growth at the airport will be dependent upon significantly improved access arrangements which are unlikely to be forthcoming in short to medium term.

The Arup Employment Study recommends growth at Longwater. This appears to be based on comments in the supporting text in the South Norfolk Local Plan (SNLP) regarding the future potential of such land. The comments in the SNLP do not constitute policy. It is necessary therefore to compare Longwater against other potential locations. The Arup Study does not appear to do this and further consideration needs to be given to the alternative locations for strategic employment provision. The Arup report also contends that Longwater is a good location for further business park activity. This is despite the fact that Longwater has proven to be an unattractive location for such activity over recent years. Longwater was allocated by the SNLP for B1/B2/B8 uses, but is dominated by retail and quasi-retail uses which in turn impacts on the perception of Longwater as a strategic location for industrial, office and warehousing development. No evidence is advanced by Arup as to why the image of Longwater will change and become an attractive location for B1/B2/B8 users. Conversely, there is clear evidence that locations south of the City are strongly in demand for industrial, office and warehousing development.

In order to deliver the additional 250 hectares of land required to drive employment growth of the Norwich City Region additional strategic allocations are required. It is also important that sites are made available for development in the short term. Land at Harford Bridge, Ipswich Road should be identified in the Core Strategy as strategic employment location for early delivery. Harford Bridge is strategically located on the southern side of Norwich in an area which business demands as a location. It is well placed to build on the success of the Broadland Business Park as a



	<p>location and is immediately available for development. The attached masterplan framework document sets out how the site could be developed sensitively to respect the river corridor, to enhance the gateway to Norwich and to help deliver the objectives for public access and habitat recreation in the Yare Valley.</p> <p>Land at Harford Bridge should be allocated by the Core Strategy as an employment allocation.</p>	
7216	Salhouse Parish Council Lack of coordination between agencies.	
7240	Mr Richard Atkinson Programming of infrastructure works Ensuring adequate and timely investment in public transport	
7270	Bidwells There appears to have been very little background work undertaken on the Mangreen / Swardeston/ Mulbarton/ Swainsthorpe area (questions 13-17), as this is the first time this potential site has appeared in the Joint Core Strategy. There are a number of unanswered questions and lack of published evidence in respect of the area's ability to contribute to delivery of housing in the Norwich Policy Area at the rates anticipated in the East of England Plan, In conclusion, Gladedale (Anglia) Ltd believes that Hethersett /Little Melton has the best chance of providing a sustainable community capable of delivering housing at the rates required to make a significant contribution to the N PA's housing target for the plan	
7290	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (N PA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymond ham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymondham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Pelham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to</p>	



protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the All trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development; well connected and well served development; thriving and delivered on



time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas, It confirms that landscape and design features can be put in place to mitigate any localised landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymond ham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a 'business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area. The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 1 1 in Wymondham.



	<p>A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.</p>	
7299	<p>Breckland District Council Limited growth at Wymondham in the context of significant growth further along the A11 may not provide the critical mass to significantly improve transport in terms of bus and rail and junction improvements on the A47 and A11. The option also presents a potential imbalance with limited housing in a sector of the Core Strategy area where there are a number of strategic employment locations.</p>	
7374	<p>I E Homes and Property Ltd See answer in question 13</p>	
7433	<p>Environment Agency (Eastern Area Office) All infrastructure should be in place in time, and where relevant operational, for development. This is as applicable for green infrastructure as for conventional infrastructure. Use of phasing will be important to enable AWS to factor any required improvement works into their business plans.</p> <p>The WCS provides information on the relative constraints of development in the locations proposed we assume that the findings of stage 1 have already been taken into account when deciding on the proposed areas for development and that stage 2a will be used to narrow down the options further.</p> <p>Within Norwich City Centre, flood risk is likely to be the greatest environmental constraint. As discussed above, a level 2a SFRA would help to assess the varying risk across the City Centre and plan around it. We would also support an interdisciplinary approach, for example allocating green spaces to areas unsuitable for built development due to high flood risk. Such an approach may help reduce food risk overall by securing or even improving the provision of floodplain within Norwich.</p>	
7468	<p>Hethersett Parish Council Refer to answers for Q.22 to 25</p>	
7542	<p>Mr Richard Atkinson Programming of infrastructure works Ensuring adequate and timely investment in public transport</p>	
7557	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Constraints to Delivery Norfolk Constabulary will require capital funding via the community levy scheme to provide additional Police infrastructure to growth areas.</p>	
7585	<p>Norfolk Wildlife Trust Regarding green infrastructure to the West, the Yare Valley and Bawburgh Lakes already have high biodiversity value and it will be critical to retain this value if there is increased public access to these areas. The evidence for this can be found in the number of County Wildlife Sites in the area whose value is maintained through management that seeks to zone areas for wildlife and for public access. In contrast Bawburgh Pits CWS currently provides a secluded wildlife area with limited public access and careful development would be required to ensure that increased access did not harm the biodiversity value</p>	



7629	CGMS Ltd (Mr Richard Atkinson) [7681] Programming of infrastructure works Ensuring adequate and timely investment in public transport	
7701	Trustees of Beston Estate (Mr Michael Dewing) [7691] Early development would be possible provided that all land west of A1151 is treated as a discrete part of the Growth sector, and is not held back by being required to form a single Masterplan exercise with the Rackheath/Thorpe End main parts.	
7732	Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] If this option was taken without a link between the NNDR and the A47 amount of traffic generated trying to access north of Norwich would be unsustainable.	
7769	Entec UK (Mr Simon Warner (Wymondham)) [7036] Long Stratton is unable to accommodate the proposed levels of growth outlined in the Joint Core Strategy. As a result further allocations should be made in Wymondham where growth can be incorporated.	
7798	Long Stratton Parish Council (Mrs E Riches) [2029] Definately would need employment, as otherwise with large scale development and commuting, it would soon be back to transport problems!	
7825	NHS Norfolk (Deborah Elliott) [7666] This option would create additional jobs in the health sector. A major constraint to delivery could be availability of appropriately skilled staff in the primary, community and secondary healthcare sectors.	
7843	Scott-Brown Partnership (Mr Steven Scott-Brown) [4310] Long Stratton is not a sustainable location I that it has relatively little employment - other than SNC - and no rail access	



Q15. FOR OPTION 3 - What opportunities does this option present?	
	There were 26 responses to this question.
	Issues mentioned include Long Stratton bypass and traffic, sustainable transport infrastructure, retail floorspace, integration of new homes with jobs, community infrastructure, new green spaces/ landscape and public transport. Communities mentioned include Long Stratton, Rackheath Norwich, Wymondham and Blofield.
6853	Anглиan Water Services Ltd Refer to Water Cycle Study Stage 2A report
6937	Thos. Wm. Gaze & Son A bypass at Long Stratton would relieve the single largest bottleneck on a major route between Ipswich and Norwich, bringing wider benefits to the region through improved transport links, both for private and commercial traffic, and providing a key link between the GNDP policy area and the Haven Gateway.
6957	Woods Hardwick Planning A large scale growth location on land that is suitable for development with sustainable transport infrastructure. There is the potential to expand in the Rackheath Area in the future
7110	Tesco Stores Ltd Maximising the use of existing facilities and infrastructure including improvements as necessary to accommodate increased demand for retail floorspace.
7125	<p>Thorpe and Felthorpe Trust The focus for TFT and the consortium is to integrate new homes with jobs and community infrastructure within a sustainable urban footprint and critically to link these key land uses and infrastructure with existing city fringe neighbourhoods as well as future communities to enhance amenity, sustainability and quality of life for all. The creation of a new urban extension in North East Norwich provides the opportunity to achieve this, while at the same time creating significant new capacity within the city for growth which will serve to enhance and compliment the historic core of the city. The sustainable urban extension will be comprised of vibrant, self-sustaining communities which are integral to the city but which do not place an undue pressure on the historic core and existing civic infrastructure. Rather they develop as a new, attractive place in their own right.</p> <p>In addition it will create the opportunities for:</p> <ul style="list-style-type: none"> • Improved connectivity between the city and 'fringe' communities; • Promoting sustainable modes of transport and creating 'walkable' neighbourhoods; • Enhancing and maintaining important landscape features and biodiversity, which are important for informal recreation, health and well-being; • The creation of more jobs and better access to employment opportunities; • Delivering a choice of high quality housing within distinctive neighbourhoods; • Innovative urban design which creates a sense of place;



	<ul style="list-style-type: none"> • Increased services and facilities to serve local communities (both established and new); • Sustainable design and construction which encourages healthy, environmentally conscious lifestyles and reduces carbon dependency. 	
7146	<p>Savills This option enables the GNDP to take a long term strategic view concerning the direction of growth for Norwich. We consider that this Core Strategy should put in place an approach which will endure beyond the end of the Plan period. The appendices to the consultation document clarify that the options for North East Norwich involve longer term expansion beyond 2026 for at least 10,000 homes in total. With that in mind we consider that the Core Strategy should explicitly identify North East Norwich as an area of major growth for the plan period and beyond of at least 10,000, with 6,000 homes to be delivered by 2026. Putting in place this longer term strategy will assist in masterplanning new neighbourhoods and developing an infrastructure strategy.</p> <p>The option will enable further masterplanning work to be put in place for an integrated mixed use urban extension to Norwich based on the principles of walkable neighbourhoods and to plan strategically for the range of facilities needed by new communities, from education to transport to shopping and recreation. As part of that masterplanning we envisage the creation of a major new neighbourhood along Salhouse Road, close to the existing urban edge, including the provision of a district centre and significant new housing.</p> <p>The Option will enable the completion of an inner link from Wroxham Road to Broadland Business Park to improve connectivity and assist with delivery of new housing in a key location close to the urban edge. It will also enable further development of ideas for significant environmental enhancements and to contribute to the Green Infrastructure Strategy through measures such as heathland recreation.</p>	
7175	<p>Costco Wholesale UK Ltd The provision of a suitable employment definition would allow appropriate employment uses to locate with the Strategic Employment Locations and would therefore stimulate and encourage suitable growth within these areas. This representation is submitted on behalf of Costco Wholesale UK Ltd (Costco) who operate a number of wholesale warehouse clubs throughout the country, typically located on employment land. Costco operates sui generis membership warehouses and was created to serve the wholesaling needs of the small to medium sized business owner. At Costco, businesses can purchase products at wholesale prices, which are significantly lower than those of traditional sources of distribution. Businesses can obtain most of their inventory needs from under one roof. Each warehouse sells a wide range of products, although the variety within each product range is limited. This enables Costco Wholesale to serve a wide range of businesses, providing a core range of products at low prices.</p> <p>Costco is a reputable employer and would benefit the Broadland, Norwich and South Norfolk area by offering a range of employment opportunities to local people. The level of jobs provided by Costco compares favourably in employment density levels to traditional B Class Uses. The company</p>	



	<p>provides local people with a broad range of quality jobs that reflect the unique nature of Costco's operations. In addition there would be indirect job creation through the support given to small local businesses.</p> <p>Overall in the UK, over 90% of the jobs created by a new Costco are filled by locally recruited staff. Throughout the company, staff are encouraged to undertake training and to improve their positions. 85% of Costco's current managers are home grown having worked their way up from hourly paid positions. Positions range from craft and operative jobs for which specialist training is given, to managerial and supervisory jobs and unskilled jobs, which provide a point of entry for those who have little or no qualifications or training.</p> <p>The benefits of a warehouse club such as Costco are that the positive impacts spread throughout the local economy. Costco's target customer is the small and medium businesses and many of these can be found in town centres. They include;</p> <ul style="list-style-type: none"> • Independent Retailers • Food and drink outlets such as restaurants and sandwich shops • Service outlets such as small estate agents, accountants, garages and professional firms • Independently owned hotels, guest houses etc <p>Costco can therefore make a significant contribution to the health of the local economy and, particularly to small businesses that are otherwise forced to pay a premium for small purchases from traditional wholesale sources. Costco's prices and its range of products are unique in this respect.</p> <p>The potential positive benefits of a Costco were the subject of an independent report by CB Hillier Parker of October 2000 "Costco Warehouse Clubs: An assessment of Economic Impacts". The report, enclosed, confirms the substantial cost savings potentially available to local businesses as well as the significant penetration, which Costco achieves of local business memberships. 78% of members questioned in the study agreed that Costco's low prices help them retain competitive and the study drew the conclusion that:</p> <p>"...significant positive impacts would benefit local economies from the development of a Costco warehouse. (para. 6.10)"</p> <p>The construction of a Costco in the Broadland, Norwich and South Norfolk area would bring a number of benefits to small businesses and the wider economy in terms of employment generation for both a skilled and unskilled workforce. It is therefore important that provision is made within the JCS for a policy by which an application for a warehouse club and other sui generis uses acceptable on employment land could be assessed.</p>	
7191	<p>Savills For the reasons outlined under Question 14 the option is likely to fail to realise the economic opportunity that the RSS growth strategy has put in place for the Norwich sub-region. In terms of employment growth therefore it represents a missed opportunity.</p>	



7199	<p>Persimmon Homes In relation to Wymondham, this option offers a strategy that spreads the new development around the town in a larger number of smaller developments and therefore presents the opportunity of less risk of delay and better use of existing infrastructure, whilst offering the opportunity to share the costs of any essential new infrastructure between various developers. The much shorter lead in period and spread of site and developers would also mean that it would be possible to take full advantage in due course of an improved housing market to achieve the delivery of the required increase in housing</p>	
7217	<p>Salhouse Parish Council Major improvements to the items listed in Q3.</p>	
7285	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymond ham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peigham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is</p>	



questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the A1 trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development; well connected and well served development; thriving and delivered on time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas. It confirms that landscape and design features can be put in place to mitigate any localised



landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymondham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 11 in Wymondham.

A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.



7300	<p>Breckland District Council Limited growth at Wymondham in the context of significant growth further along the A11 may not provide the critical mass to significantly improve transport in terms of bus and rail and junction improvements on the A47 and A11. The option also presents a potential imbalance with limited housing in a sector of the Core Strategy area where there are a number of strategic employment locations.</p>	
7375	<p>I E Homes and Property Ltd Spreading growth and investment throughout the NPA to include the southern part of NPA currently overlooked despite A140.</p>	
7436	<p>Environment Agency (Eastern Area Office) There are opportunities for new, planned green spaces, links and corridors. This would improve biodiversity and in some cases may create new wildlife habitat. There is an opportunity to improve water resource and waste water treatment provision, moving away from a reliance on old sewer networks, many of which are combined surface and foul water.</p>	
7469	<p>Hethersett Parish Council Refer to answers for Q.22 to 25</p>	
7519	<p>King Sturge The third growth option for the area is predicated upon increasing the amount of housing to smaller sites in Broadland from 2,000 to 3,000 dwellings. This option is supported in preference to the other two options, providing that an increase in housing numbers is directed towards Blofield.</p> <p>There is sufficient available housing land at Blofield which could accommodate the higher level of growth envisaged for Broadland's smaller sites. Garden Farm would make a valuable contribution to meeting this target. Indeed, growth at Blofield should be increased in line with other Key Service Centres given the overall level of scale of housing that needs to be accommodated in the Norwich Policy Area.</p> <p>There are a number of opportunities presented by this option. Further housing would help consolidate Blofield's position in the settlement hierarchy at a time where the viability and vitality of its main services are diminishing in the absence of any recent housing development. The opportunity to reverse this trend through additional housing would benefit the borough as a whole as it becomes easier to retain local inhabitants from moving outside the area.</p>	
7543	<p>Mr Richard Atkinson The opportunities for developing a coherent public transport led strategy appear to be less than with the other options</p>	
7560	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Opportunities</p> <p>Norfolk Constabulary considers that growth will provide the opportunity for greater cross working between public service providers to share new infrastructure (sites) to mitigate the cost impact to services and the public.</p>	
7586	<p>Norfolk Wildlife Trust The opportunity to create new biodiversity rich landscapes to link with existing areas such as the Broads and South Norfolk landscape of commons and woodlands.</p> <p>It should be made clear that habitat creation in the north-east sector will encompass parkland, grassland and woodland in addition to heathland. Heathland was the main historic component of this area but habitat creation will need to include other habitats particularly in those areas outside of the historic boundary of Mousehold Heath (as shown in Fadens</p>	



	<p>maps of 1797).</p> <p>In order to provide further access opportunities and to take the pressure off habitats in the Yare valley bottom (see question 14), it is important that green infrastructure in this area should include the valley slopes and include woodland, grassland and former heathland habitats.</p>	
7630	<p>CGMS Ltd (Mr Richard Atkinson) [7681] The opportunities for developing a coherent public transport led strategy appear to be less than with the other options</p>	
7702	<p>Trustees of Beston Estate (Mr Michael Dewing) [7691] Farm ownership and occupation interests can both enable an early phased development in conjunction with Norfolk CC land, and assumed to be required in 2010-16.</p> <p>The land is adjacent to the existing urban area utilities and facilities, with public transport. The landscape compartments and retention of historic parkland framework in this sub-area tend to favour a development form as an extension of the urban area, rather than being part of a contiguous Rackheath new town.</p>	
7733	<p>Kimberley & Carleton Forehoe Parish Council (Miss R L Gladden) [2022] Limited. The amount of investment in restricted existing environments at Easton, Wymondham and Hethersett make this an unviable option.</p> <p>The opportunities to create a new town at Long Stratton appear to have been overlooked but would surely be the most cost effective.</p>	
7770	<p>Entec UK (Mr Simon Warner (Wymondham)) [7036] Like option 2, this option currently allocates 2,000 new homes in Wymondham, however, this should be increased,</p> <p>based on the Joint Core Strategy evidence base. Wymondham is well connected to key locations, with a range of social infrastructure, employment and retail to accommodate growth. Further growth at Wymondham would allow the required growth to be fully accommodated in a settlement within the Norwich Policy Area.</p>	
7799	<p>Long Stratton Parish Council (Mrs E Riches) [2029] Great if the funding is there to provide all required, if not leave things alone!!</p>	
7826	<p>NHS Norfolk (Deborah Elliott) [7666] This option presents the opportunity to review and plan strategically for the health needs of the Greater Norwich Area over the next 15 - 20 years.</p>	



Q16. FOR OPTION 3 - How will this link with your longer term investment strategies?		
	There were 23 responses to this question.	
	Issues mentioned include growth and investment, sustainability, employment at Norwich Airport and wildlife habitat. Communities mentioned include Rackheath, Easton, Sprowston, Harford Bridge, Norwich, Wymondham, Tasburgh, and Colney..	
6854	Anglia Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6938	Thos. Wm. Gaze & Son It will provide an important growth point in the region	
6958	Woods Hardwick Planning There is the potential to expand in the Rackheath Area in the future due to the availability of land and its location	
7031	Easton College This option runs the risk of undermining the investment strategy in Easton.	
7111	Tesco Stores Ltd Tesco's existing stores at Sprowston and Harford Bridge are designed to serve the surrounding community. Growth in the vicinity of the stores would encourage investment in them.	
7128	<p>Thorpe and Felthorpe Trust As a trust, TFT has a long term commitment to the sustainable development of the area. As such their financial models are based on long-term investment as opposed to short-term returns. The TFT and other members of the consortium are committed to achieving a longterm strategy for their land-holdings, which is consistent for good place making and creating a sustainable urban extension in North East Norwich.</p> <p>However, the financial models to deliver this need to be carefully constructed in terms of timescales and yields for the relevant landowners in respect of acquisition of funds, cash flows and anticipated returns.</p>	
7147	Savills Allocation of this broad area for major development will enable an investment strategy to be developed as an integral part a masterplan for the long term sustainability of the new neighbourhoods. Such a strategy will need to encompass the future management arrangements of community facilities and open spaces. The scale of development proposed, including identification of growth beyond the plan period, will provide the landowners and developers confidence to invest for the long term.	



7200	<p>Persimmon Homes Persimmon Homes Anglia have an interest in a 9 hectare site at Norwich Common, Wymondham, which offers the opportunity to provide some 300 dwellings on a site close to existing employment opportunities, very well served by existing services and facilities and with good pedestrian, cycle and public transport links to the town centre and to Norwich. They are actively promoting this site through the LDF and SHLAA processes. It would be their intention to develop this site at the earliest opportunity.</p>	
7241	<p>Mr Richard Atkinson We welcome the fact that the option identifies a strategic employment site at Norwich Airport. This is in line with our investment strategy for land north of the Airport, which will maximise the benefits offered by this regionally important facility and the accessible location within the Greater Norwich area. The position of the symbol suggests that the site should lie to the south of the Distributor Road which would be unduly restrictive if the site is to be of a strategic nature.</p>	
7286	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymond ham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peigham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area,</p>	



particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & BidweNs, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the A1 trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

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In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

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It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 11 in Wymondham.

A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD),



	linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.	
7376	I E Homes and Property We have housing and employment land fronting the A140 in Tasburgh which is brownfield which we can make available for development.	
7439	Environment Agency (Eastern Area Office) Within our remit are permissive rights for the maintenance of designated main rivers and the construction of flood defences and control structures. Whilst our work is not directed by local authorities' development frameworks, synergy between our organisations can result in a better outcome for all parties. We therefore recommend that as plans develop and final options are chosen, with timings, phasings, etc. we are kept up-to-date to ensure opportunities for close working are maximised.	
7470	Hethersett Parish Council Refer to answers for Q.22 to 25 -	
7544	Mr Richard Atkinson While we welcome the fact that the option identifies a strategic employment site at Colney, the option is unclear about the scale of residential development which could take place at Colney Lane and which would benefit from the education and employment opportunities available at this location and the high quality public transport links which the strategy would promote. Our investment strategy for Colney Lane is intended to maximise these benefits.	
7563	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Investment The Force is already investing in its 'Long Term Estates Strategy' to replace Police Stations and premises which are not fit for purpose in the County of Norfolk. Additional population growth will place additional demand on capital budgets to provide the required Police infrastructure to support the new communities.	
7587	Norfolk Wildlife Trust Habitat creation initiatives in south Norfolk countryside co-incide with NWT proposals to take forward a "Claylands" Living Landscape Project as part of our Business Plan	
7631	CGMS Ltd There would be a strong link with our long term investment strategy which aims to deliver an eco-community at Rackheath. This would make a significant contribution to the identified strategic growth location of 6000 houses in the north-east sector	
7703	Trustees of Beston Estate This farm estate has been working in detail with Highways (Charles Auger) to facilitate the NDR central section. Farming operations would be maintained in one block from the airport to Rackheath Church Wood, still centred on Red Hall Farm-	



7734	Kimberley & Carleton Forehoe Parish Council There would be no direct link. -	
7771	Entec UK As previously stated the option allocates 4,000 dwellings to Wymondham. Hopkins Homes interests relate to land south of Wymondham, at which Hopkins Homes seeks to deliver a high quality residential led mixed use scheme, including employment uses, affordable homes, and public open space. Hopkins Homes seek an allocation for this site within the housing requirements for Wymondham.	
7800	Long Stratton Parish Council Could perhaps combine with other villages in some ways.	
7827	NHS Norfolk This will help to drive our longer term investment strategy.	



Q17. FOR OPTION 3 - Could your organisation commit to support it if it were selected?		
	There were 33 responses to this question. Twelve say they could commit to support and seven say they could not.	
	Issues mentioned include protection of rural communities, infrastructure, land ownership, sustainability, retail provision and transportation. Communities mentioned include Mangreen, Swardeston, Mulbarton, Swainsthorpe, Wymondham, Easton, Sprowston, Rackheath, Norwich, Hethersett and Little Melton.	
6855	Anглиan Water Services Ltd Yes, assuming the Water Cycle Study produces an agreed strategy	
6896	Bracon Ash & Hethel Parish Council They are totally opposed to option 3 which involves the creation of a new town in the Mangreen/ Swardeston/ Mulbarton/ Swainsthorpe area. South Norfolk Council were elected on their promise to protect the rural communities and this proposal goes completely against that promise. The infrastructure in surrounding villages is not consistent with any such development. Whilst it is understood that new infrastructure would be provided for the new community there would be an inevitable knock on effect to those villages which are near the development and the infrastructure cannot and should not look to change the countryside. The Council feels that any development should be done in smaller allocations throughout the district rather looking to increase existing villages and towns naturally than to create new ones. Some smaller villages such as our own parish could see improved sustainability if small amounts of development were to be granted sympathetically across the area.	
6901	M. Falcon Property Solutions Michael Falcon, the project co-ordinator has had discussions with all the Landowners, or their representatives, with regard to all the land shown crosshatched on Map 2 - Landownership. All the landowners shown on this plan have indicated their support to development in the area as part of option 3 in the Joint Core Strategy. The number of Landowners affected by the scheme is relatively small considering the size of the proposed Development, and Michael Falcon does not envisage any problems in delivering the land areas involved.	
6939	Thos. Wm. Gaze & Son Yes	
6959	Woods Hardwick Planning Yes	



6983/4	<p>Diocese of Norwich In terms of the broad locations for major growth, the Diocese of Norwich support Option 1, as set out within the consultation document. Under options 2 and 3, 2,000 dwellings are proposed at Wymondham in both instances. The Diocese of Norwich consider that Wymondham represents a highly sustainable opportunity for further growth, with the levels of services and facilities provided within the town and its accessibility by public transport justifying the delivery of 4,000 dwellings at Wymondham, rather than the 2,000 dwellings which are proposed under Options 2 and 3. The Diocese of Norwich consider that option 3 is inappropriate, particularly in view of the proposal to locate 4,500 dwellings to the South of Norwich (Mangreen / Swardeston / Mulbarton / Swainthorpe area). Under Option 2 and to a greater extent under Option 1, growth is more sustainably located through extensions to existing urban areas. It is understood that the direction of 4,500 new dwellings to the South of Norwich (Mangreen / Swardeston / Mulbarton / Swainthorpe area) will effectively comprise the establishment of a new settlement. This approach is considered less sustainable than an approach which seeks to direct development to existing settlements owing to the immediate benefit to new housing at existing settlements of existing services, facilities and infrastructure and indeed the support that such growth provides to existing services, facilities and infrastructure</p>	
7032	<p>Easton College The partners could not support an approach which undermined investment plans at Easton.</p>	
7039	<p>Gerald Eve he Arable Group (TAG) wish to express support for the proposed strategy for growth outlined in Policy 5. TAG consider that land to the North East of Norwich is capable of delivering a significant level of housing provision to contribute to meeting the strategic housing requirement for the Norwich Development Area. TAG welcomes the identification of 6000 new homes to be delivered in the Sprowston/ Rackheath Area in all three proposed development options. It is noted however, that the Sprowston/ Rackheath Strategic Growth Location for Growth in the as identified on the Growth Options maps at Appendices 1-3 excludes and sites at the settlement boundary to the east of the airport and to the South of the proposed route of the North Norwich Distributor Road, which is assessed in the Strategic Housing Land Availability Assessment (to which separate representations have been made on behalf of TAG). Although it is acknowledged that these maps are illustrative, it is considered important that they are revised to clearly show this area as part of Sprowston/Rackheath Strategic Growth Location.</p>	
7112	<p>Tesco Stores Ltd Yes. Tesco could commit to support the delivery of urban extensions in these locations. These extensions would require enhanced retail facilities which the aforementioned stores are capable of committing to.</p>	
7131	<p>Thorpe and Felthorpe Trust The TFT and emerging consortium is committed to supporting a sustainable urban extension in North East Norwich and is developing the landownership and legal framework to deliver this effectively</p>	



7148	Savills The landowners are committed to working collectively with GNDP and other partners to deliver a vital and viable urban extension at North East Norwich.	
7202	Persimmon Homes Yes	
7218	Salhouse Parish Council No - it represents over-development of the area.	
7242	Mr Richard Atkinson The opportunities for developing a coherent public transport led strategy appear to be less than with the other options Of the three options, we would be less inclined to support option 3 because we consider it to be less sustainable, given that it would rely more heavily on private transport solutions.	
7287	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymond ham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peiham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant</p>	



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Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the A1 trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

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Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites, including Gateway 11 in Wymondham.

A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy,



	rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.	
7377	I E Homes and Property Yes along with option 2.	
7442	Environment Agency (Eastern Area Office) With all proposed options we are unable to lend direct support, however, our organisation produces, or is involved in, a number of studies that will benefit whichever option is chosen. Studies include Catchment Flood Management Plans, Shoreline Management Plans, the Review of Consents, Greater Norwich WCS, Greater Norwich Green Infrastructure Study (GIS) and the Norwich City Council, Broadland District Council, South Norfolk District Council and Broads Authority SFRAs	
7471	Hethersett Parish Council YES, this is the preferred option of the Parish Council.	
7545	Mr Richard Atkinson Of the three options, we would be less inclined to support option 3 because moving the focus away from the Newmarket Road corridor would reduce the potential for developing sustainable linkages between proposed residential areas (and our proposed development at Colney Lane) and the range of education, employment and public services which are concentrated in this corridor	
7566	Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Organisational Support Norfolk Constabulary has a statutory duty to provide a Police service to communities in Norfolk. C - 7566 - 7653 - Q17. FOR OPTION 3 - Could your organisation commit to support it if it were selected? -	
7588	Norfolk Wildlife Trust We would support if the opportunities for green infrastructure and creation of new biodiversity rich landscapes were an integral part of any new developments and if they represent eco-town target of 40% greenspace.	
7604	Thurton Parish Council No	
7632	CGMS Ltd Although, given that it identifies a strategic growth location in the north-east sector, we could support this option, we question whether Option 3 is sustainable given the pressures that development near the A47/A140 junction would place on the road network, the environmental implications of significant development at Long Stratton, and the lack of availability rail- based public transport options.	
7686	Andrew Martin Associates (Goymour Estates) Yes, The land owners and developers have a firm commitment to delivery	
7704	Trustees of Beston Estate Yes	



7735	Kimberley & Carleton Forehoe Parish Council There would be less opposition to this option.	
7754	Colney Parish Council The JCS was discussed at the Committee Meeting for Colney Parish on 27th August 2008. There are many good ideas in the document especially those relating to the environment and village communities. However, concerns were expressed that the massive scale development envisaged was based on a Regional Spatial Strategy that was out of date and unsustainable. We therefore cannot support any of the large scale developments proposed and believe that building on this scale would have an adverse impact upon quality of life in the County.	
7772	Entec UK Whilst it our belief that Wymondham can accommodate a much greater amount development than is proposed within this option, Hopkins Homes site at South of Wymondham could help deliver the required housing growth in Wymondham. As demonstrated within this document the site is deliverable, available, suitable, and achievable. As a result and the sites strategic nature we seek that this site is allocated for development within the Joint Core Strategy in line worth guidance in PPS12.	
7782	Mrs H Williamson I read in various places of the large number of homes proposed near and around the village of Heathersett. How can this area possibly cope when problems have arisen with sewage, narrow lanes and lack of forward planning when Wimpey started work here last year The only possible Option would have to be is Option 3 Space between Little Melton and our neighbours in Wymondham are and should remain in farming land.	
7801	Long Stratton Parish Council Would not be able to say until it was known that there would be funding.	
7828	NHS Norfolk NHS Norfolk would support the appropriate healthcare developments of whichever option is chosen.	



Q18 What additional significant infrastructure requirements would there be?	
	There were 26 responses to this question.
	Issues mentioned include wastewater treatment in Aylsham and traffic in Diss, policing, retail floorspace, water supply, green links / infrastructure, renewable energy, NNDR/ junction improvements on A47, housing allocations, pressure on facilities in Harleston, healthcare, growth in Diss and public transport infrastructure. Communities mentioned include Aylsham, Diss, Harleston, Wymondham, Hethersett, Reepham, Wroxham, Norwich, Acle, Colney and Cringleford.
6856	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report. However, it is wrong to state that growth in Aylsham is constrained by the wastewater treatment works. If a new consent can be agreed with the Environment Agency, then growth would be possible. A new consent will depend upon the environment's ability to absorb the increase in treated effluent. This can be explored by the Water Cycle Study in the Stage 2B process. This principle applies to all wastewater treatment works
6940	Thos. Wm. Gaze & Son Reversing traffic flows at the junction of Victoria Road/ Mere Street in Diss so that traffic can be directed towards the town centre and not to the edge of town supermarkets, or the proposed car-based mixed retail proposal for Park Road south. At present Diss town centre is effectively bypassed by through traffic, which means the effect of edge of town development is felt even more acutely by town centre retailers. However this may be addressed by the Area Action Plan.
6992	Michael Haslam Associates Ltd We do not agree with the proposal in Policy 6 that there should not be a housing allocation at Aylsham because the sewage treatment works are at capacity. The decision to exclude Aylsham at this stage appears to have been taken because the Water Cycle Study prepared by Scott Wilson estimated the cost of upgrading the existing Aylsham STW for 2,000 houses to be £21.3 millions. It is not clear where the figure of 2,000 additional houses came from and why it was used as the basis for estimating the cost of extending the existing STW. Paragraph 7.8 the Regulation 25 Technical Consultation document makes it abundantly clear that Aylsham has land available for new employment development, spare capacity in all its schools and the fourth highest level of shops and services outside Norwich. It is therefore exceptionally well placed as a location for further housing growth. Policy 6 proposes additional housing allocations for 300 houses in Diss and 200 to 300 houses at Harleston. We propose that Aylsham should have an additional allocation of 600 to 1,000 houses to reflect the spare infrastructure capacity that exists in the town. The assumption that there is an insuperable sewage treatment problem at Aylsham is not correct. The provision of additional sewerage capacity to serve a new housing allocation at Aylsham is a technical matter that can easily be resolved by either extending the existing sewage works or providing a new sewage treatment plant to serve the new housing allocation. Anglian Water has indicated to Millard Consulting that the cost of increasing the capacity of the STW to accommodate a development of 600 houses is approximately



	£1million above the previously programmed costs to increase capacity at the STW. A copy of Millard's e-mail of 24 September 2008 is attached.	
7113	Tesco Stores Ltd Creating an additional 300 homes in Diss will inevitably cause a need for an increased amount of convenience goods floorspace. Owing to the central location of the existing town centre Tesco foodstore, it is well placed (in planning policy terms) to serve convenience shopping needs, it would be logical for any additional retail floorspace needed to be accommodated within this store.	
7254	Les Brown Associates Further research required (as in Aylsham)	
7288	Bidwells Wrenbridge (Harts Farm) Ltd contend that a commercial led mixed use development scheme at East Wymondham (Browick Road) can be delivered within existing infrastructure capacity. Evidence gathered as part of earlier planning proposals in the area (NJP planning application) demonstrates that sufficient infrastructure capacity already exists or can be delivered, to accommodate growth at East Wymondham. In particular, previous evidence accepted by South Norfolk Council in granting permission for the NJP scheme at Browick Road demonstrates that the existing junction onto the A11 has sufficient capacity to accommodate more traffic movements. South Norfolk Council is already aware of this evidence, so it is not re-submitted alongside this representation.	
7314	<p>Norwich Green Party</p> <p>Main Towns and Key Service Centres</p> <p>8. In the descriptions of Main Towns and Key Service Centres, Diss and Harleston are identified as requiring a new water supply for any further development, while growth in Aylsham, Hethersett, Reepham and Wroxham is shown to be limited to varying degrees at present by existing sewer capacity. The common recurrence of these themes points to a likelihood that they will be major issues with the scale of development envisaged and it is surprising that descriptions for some of the larger developments proposed, such as North East Norwich or Wymondham, omit mention of these vital prerequisites.</p> <p>Reducing Environmental Impact</p> <p>9. Under Policy 13, the strategy requires all new housing to match the 'Housing Corporation requirements under the Code for Sustainable Homes'. This is currently set at Level 3 and yet we have argued that to have any hope of meeting greenhouse gas reduction targets, the standard should be Level 4 or higher.</p> <p>10. It is also worth bearing in mind the assertions in the remainder of Policy 13 that, for instance, all development will 'contribute to conserving scarce resources, protecting sites that are important for biodiversity, landscape character and protecting mineral and other natural resources'. We might also mention Policy 17 which states that 'environmental assets of the area will be protected, maintained and enhanced'. In practice, as detailed previously and elsewhere in this response, much of what is proposed sits uneasily with these laudable aims and yet it is important that these statements are taken seriously enough for objectors to have the</p>	



	<p>ability, where appropriate, to effectively challenge development on the grounds of detrimental environmental impact.</p> <p>11. In Policy 15 the statement that a 'readily available supply of land is maintained throughout the JCS period' seems to signal a clear intention that environmental or other constraints will be overridden by immediate economic imperatives. This is potentially contradictory to the sustainability objectives expressed elsewhere in the strategy. Similar concerns arise from the statement in 8.8 that 'provision will also be made for affordable homes to meet a demonstrated local need on sites that would not otherwise be released for housing'. It is a real concern that the pressure on land because of large scale development could mean this provision being used to justify the building on environmentally sensitive sites.</p>	
7378	I E Homes and Property Ltd Dealing current flooding and drainage problems in Wymondham	
7443	Environment Agency (Eastern Area Office) Development in Wymondham has suffers from old foul and surface water drainage that and has an uncertain capacity throughout the network. We note that growth of between 2000 and 4000 new homes is proposed which would exceed the current infrastructure capacity of the area. An assumption has been made within stage 2 of the WCS that all sewer networks are at capacity. Any development in Wymondham must therefore consider the need for improvement to the sewer network very carefully since this will form a major constraint if growth is planned early in the lifetime of the JCS.	
7472	Hethersett Parish Council No comment	
7487	Ingleton Wood Creation and enhancement of green links to rural catchment (upgraded cycle routes and footpaths) Renewable energy Detailed assessments of Main Towns would be required	
7511	Keymer Cavendish 6.2 Page 19- Main Towns As stated in our introduction, we do not feel that Wymondham should take strategic growth. We feel that this would directly contradict Objective 11 which aims to reduce the need to travel. 6.3 Page 25- Key Dependencies Para 6.2: we feel it is a mistake to invest in junction improvements on the A47 when the problems occur only at peak times. If peak hour congestion persists and public alternatives are made available, people will not travel by private car	



7515	Bidwells <p>Policy 6 (Main Towns) allocates specific housing numbers each of the four chosen Main Towns. Aylsham is a thriving market town well endowed with shops and services and it is recognised in paragraph 7.8 that Aylsham has available employment land and spare capacity in all its schools. Aylsham is well-placed to accept an appropriate allocation of housing to allow its continued organic growth. But because the sewage treatment works are currently operating at full capacity, no housing allocation is proposed (other than infill).</p> <p>However, as outlined above, wastewater infrastructure capacity constraints in Aylsham would be lifted from 2016, should Aylsham be allocated any new dwellings in the Joint Core Strategy/Site Allocations DPD. Housing growth in the town could therefore take place in the years beyond 2016.</p> <p>Water Cycle Study</p> <p>The results of the Water Cycle appear to be the key determinant in the decision to not allocate any dwellings to Aylsham. In turn, this seems to be based on policy WAT2 of the East of England Plan, which urges LDDs to site new development where it can take up 'spare' water supply/wastewater infrastructure and thereby minimise the need for new/improved infrastructure. Whilst the general point is accepted, water supply and wastewater capacity are only one element in determining the strengths and weaknesses of potential new development locations. Irrespective of this, water supply and wastewater treatment works tend to need to be upgraded on a fairly regular basis (e.g. to cope with increased environmental standards), so their situation needs to be assessed over the whole Plan period.</p> <p>A more general criticism of the Water Cycle Study is that it appears to be a stage 'behind the Joint Core Strategy. For example, Kier Land Ltd would have expected to see the costs and timeframe for accommodating/providing water/wastewater infrastructure for proposed allocations in Main Towns and Key Service Centres included in Stage 2a of the Water Cycle Study. It is difficult to know what the exact cost of providing upgraded sewage treatment infrastructure for 300 dwellings in Aylsham would be, but extrapolating from the costs for upgrading for 100 and 500 dwellings, it would appear to be in the region of £2.3m. Although this figure is unsurprisingly higher than for most other Main Towns, it would not be payable by any developers • instead it would be gradually recharged through water bills.</p> <p>A quick perusal of the figures for water supply costs for other Main Towns and Key Service Centres is illuminating. For instance, using an indicative figure of 100 new dwellings, the cost of providing wastewater and water supply infrastructure for Aylsham is roughly £7.4m; for Harleston the figure is £9.8m; for Diss the figure is figure is £10.2m; and for Loddon the figure is an astronomical £14.4m1 In calculating the likely costs of upgrading wastewater infrastructure, water supply and water resources, and 'scoring' flood risk, groundwater pollution potential and surface water quality, the Water Cycle Study (revised stage 2a) finds that Aylsham scores 'better' (i.e. cheaper and less risk of environmental harm) than</p>	
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	<p> fellow Main Towns Harleston and Diss. It is interesting to note that Acle - a Key Service Centre - is proposed for an allocation of 100-200 dwellings "because no allocations can be made at Aylsham", yet in Table 5.5 of the Water Cycle Study Stage 2a (September 2008), Acle is ranked 7111 of the 8 Rural Policy Areas, with higher costs and greater environmental constraints than Aylsham. Kier Land Ltd therefore finds the decision to not allocate any dwellings to Aylsham, purely on the basis of lack of wastewater treatment capacity, very difficult to understand.</p> <p>Kier Land Ltd is promoting its site at Burgh Road in Aylsham, and believes it will be able to deliver about 200 of the 300 dwellings sought for Aylsham. The initial SHLAA analysis (September 2008) finds that the site is at low flood risk, is not close to any hazardous installations, could be accessed safely and is well-located for local services and public transport connections to Norwich. A Transport Assessment is being undertaken to provide a more detailed assessment of access, highways and public transport connections. Other utility enquiry responses suggest that the cost of connecting the site to the main gas and electricity networks will be very low as existing infrastructure is already present.</p> <p>In conclusion, Aylsham should be allocated a minimum of 300 dwellings, the same as Diss and Harleston.</p> <p>Whilst it is not possible to be certain at this juncture, it appears to Kier Land Ltd that the main infrastructure requirements to allow residential growth at Aylsham will be improvements to the wastewater treatment and water supply networks. However, improvement schemes for both are believed to be included in Anglian Waters longer-term plans.</p> <p>Aylsham is a bustling market town serving a wide rural hinterland. Allocating further housing in the town will help ensure balanced growth along with the planned expansion in employment areas. Kier Land Ltd believes that planned improvements to the wastewater treatment and water supply infrastructure will ensure that Aylsham will be able to continue to grow organically into the future.</p>	
7567	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Growth at Wymondham, Aylsham, Diss and Harleston.</p> <p>The proposed levels of growth at Aylsham, Diss and Harleston are catered for by good Police Station facilities. However, additional resource may be required to support front line policing.</p> <p>Higher levels of growth proposed for Wymondham will have an impact on Police resources. Additional resources will be required for the Safer Neighbourhood Team.</p>	
7589	<p>Norfolk Wildlife Trust Green infrastructure (see GNDP GI strategy for evidence) is critical and appropriate to all levels of growth. In south Norfolk there are opportunities to link this with the "Claylands Project" currently being developed in partnership between Norfolk Wildlife Trust, South Norfolk council and other partners.</p>	
7595	<p>Redenhall with Harleston Parish Council There would be pressure on</p>	



	<p>Leisure Facilities and therefore the Memorial Leisure Centre in Harleston, the only leisure centre, would need to be expanded /improved. There would be added pressure on the Dentist and Doctor services in the town and these would also need to be improved. At the moment when it rains hard the Town centre area is very susceptible to flooding, and with more houses this problem will increase. Therefore the drainage and sewer systems would need to be improved in order to cope with the increased use of these systems by the extra houses projected.</p> <p>Traffic flow is a problem at present especially in the narrow street called The Thoroughfare in the Town Centre and extra houses would increase the likelihood of gridlock/ traffic jams.</p>	
7610	<p>Trafford Trust Estates</p> <p>Settlement Hierarchy</p> <p>4.6. We agree with Policy 1 of the Technical Consultation and the fact that it is envisaged that new development will be focused on the urban area of Norwich, the Key Service Centres and the Service Villages. We endorse the proposition within Policy 1 that the scale of development will decrease at each level of the proposed settlement hierarchy.</p> <p>Policy approach</p> <p>4.7. The allocation and delivery of the proposed larger/strategic development areas anticipated in Policy 5 of the Technical Consultation will encompass a number of years. That being the case, it is important to ensure that the Joint Core Strategy sets out a policy framework which ensures that economic growth is facilitated and an adequate supply of housing land is maintained in Broadland/ Norwich/ South Norfolk in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the wider area, the housing land supply in the short/medium term cannot be achieved purely by means of the development of previously developed land or by placing an unrealistic reliance on the delivery of a limited number of strategic urban extensions. A number of medium-size development areas, at the edge of Norwich and the Key Service Centres/ Service Villages, should be brought forward to accommodate new housing and employment opportunities in the short/medium term to ensure that the growth agenda is not compromised in its initial phase.</p> <p>Development Locations</p> <p>4.8. The achievement of the required sustainable spatial strategy will arise via a combination of sites/locations, taking forward the comment at paragraph 1.10 of the Technical Consultation. We endorse the observation at paragraph 8.1 of the Consultation which states that "sustainable neighbourhoods are a key element of the Vision for this strategy to 2026." When considered in the light of the spatial background, we agree with Policy 5 of the Consultation which requires all growth locations in the Norwich Policy Area to achieve a high level of self containment "while integrating well with neighbouring communities." The same approach should be followed in the Key Service Centres beyond the</p>	



	NPA such as Wroxham.	
7648	<p>Drivers Jonas CEMEX supports proposed Policy 6 "Main Towns". In particular, CEMEX supports the proposed designation of Wymondham as a "Main Town". CEMEX urges the Councils to consider their site in Wymondham as a natural sustainable extension to the existing settlement. Wymondham is an established town with a range of amenities and services available for local residents. In addition, it has good public transport links to nearby settlements, including Norwich and Cambridge. Consequently, the development of this site would be in accordance with PPS1 and PPS3 as both of these planning policy statements seek development in existing settlements, in accessible locations (PPS1, Paragraph 27 and PPS3, Paragraph 36).</p>	
7657	<p>Highways Agency Policy 6 • Main Towns</p> <p>This policy lists the four main towns which will see growth under the Plan. They are Aylsham, Diss, Harleston and Wymondham.</p> <p>The Highways Agency is concerned that Aylsham has been excluded solely because the sewage treatment works is at capacity when it scores well on all other criteria such as the fourth highest level of shops and services outside Norwich, available employment land and spare capacity at all of its schools.</p> <p>The consequence appears to be to focus more development in Acle which is lower in the settlement hierarchy and is in the A47 Trunk Road corridor, which is arguably less suitable to accommodate development. The document does not identify whether the removal of this one constraint on development at Aylsham has been investigated before allocating dwellings in a way which is inconsistent with the adopted hierarchy of settlements.</p> <p>The Highways Agency would ask that any growth in Wymondham is accompanied by measures to accommodate it because of the impact on the A11, particularly the A11 /B1172 Wymondham/Tuttles Lane junction.</p> <p>Diss and Harleston, the other two towns listed do not lie on the A1 or A47 and therefore the Highways Agency has no comments to make on them.</p>	
7670	<p>Mr Robert Debbage Policy 5 allocates 2000 new homes for smaller sites in South Norfolk (i.e. Main Towns, Key Service Centres and Service Villages). When added together, taking the higher figure in any range, the totals allocated for South Norfolk's Main Towns, Key Service Centres and Service Villages totals just 1680 - an apparent shortfall of 320 dwellings.</p>	
7708	<p>Pegasus Planning Group</p> <p>4. LOCATIONS FOR MAJOR CHANGE AND DEVELOPMENT IN THE NORWICH POLICY AREA</p> <p>Settlement Hierarchy</p>	



4.1. We agree with Policy 1 of the Technical Consultation and the fact that it is envisaged that much of the new development will be focused on the urban area of Norwich, including urban fringe parishes such as Cringleford and Colney. We endorse the proposition within Policy 1 that the scale of development will decrease at each level of the proposed settlement hierarchy.

Policy approach

4.2. The allocation and delivery of the proposed larger/strategic development areas anticipated in Policy 5 of the Technical Consultation will encompass a number of years. That being the case, it is important to ensure that the Joint Core Strategy sets out a policy framework which ensures that economic growth is facilitated and an adequate supply of housing land is maintained in the NPA, in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the NPA, the housing land supply in the short/medium term cannot be achieved purely by means of the development of previously developed land or by placing an unrealistic reliance on the delivery of a limited number of strategic urban extensions. A number of medium-size development areas, at the very edge of Norwich, should be brought forward to accommodate new housing and employment opportunities in the short/medium term to ensure that the growth agenda for Norwich is not compromised in its initial phase.

4.3. The extension of the new housing and employment areas broadly off Newmarket Road would be appropriate and achievable/deliverable in the short/medium term, thereby ensuring that the momentum for the Norwich growth area is achieved in an expeditious manner. Our clients' proposals for a Norwich Gateway can represent a key element in the early delivery of the wider spatial strategy for the Norwich area anticipated in the East of England Plan. The availability of land either side of Newmarket Road, in such a strategic location, constitutes an important factor when considering the key issues of the delivery of housing and employment opportunities in support of Policy NR1 of the East of England Plan. Its early release would be a significant building block in the initial implementation of the growth agenda.

4.4. Given the policy context, we agree with the observation at paragraph 7.5 of the Technical Consultation that the existing suburbs are a key to the successful development of the Norwich area. They provide the link between the city centre and the surrounding area and the range of issues warrants a comprehensive and dedicated strategy. A recognition of the strategic importance/significance of the Newmarket Road corridor would enable the delivery of a high quality Norwich Gateway, providing the opportunity to enhance the A11 approach to Norwich from the Southern Bypass. A development of this nature will enable significant improvements to be secured in public transport, walking and cycling links, an outcome required by Policy 4 of the Technical Consultation. The park and ride service along Newmarket Road is particularly successful and we note that Policy 4 envisages a significant enhancement of public transport in the NPA which will include, inter alia, routes linking the City Centre to Cringleford/Norwich Research Park.



Development Locations in the NPA

4.5. The achievement of the required sustainable spatial strategy will arise via a combination of sites/locations, taking forward the comment at paragraph 1.10 of the Technical Consultation. We endorse the observation at paragraph 8.1 of the Consultation which states that "sustainable neighbourhoods are a key element of the Vision for this strategy to 2026." When considered in the light of the spatial background, we agree with Policy 5 of the Consultation which requires all growth locations to achieve a high level of self containment "while integrating well with neighbouring communities." The promotion of the concept of the Norwich Gateway through the JCS will achieve the delivery of important strategic objectives described in Policies 2, 4 and 5 of the Technical Consultation.

4.6. The Spatial Vision, Policy 2 and Policy 4 refer to the strategic employment location at Colney/Cringleford and the anticipated enhancement of public transport provision between the City Centre and Cringleford/NRP. Given these important elements of the emerging strategy, we consider that Options 1 and 2 within Policy 5 would secure a distribution of new housing which reflects the spread of strategic employment areas described in Policy NR1 of the East of England Plan and the transportation enhancements foreshadowed in Policy 4 of the present Consultation. Furthermore, development in accordance with Options 1 and 2 would provide the opportunity to secure enhanced gateways to Norwich as required by Policy 4 of the Technical Consultation. The concept of the Norwich Gateway on the A11 corridor should form a strategically significant part of the delivery of the spatial policy framework for the Norwich Policy Area.

4.7. Our clients have noted that the Growth options described in Appendices one-three in the Technical Consultation do not envisage the identification of a growth area on the A11 corridor between the City Centre and the Southern Bypass. We consider that a significant opportunity exists at Cringleford to respond in a positive/sustainable manner to the issues raised in the Technical Consultation and that the concept of the Norwich Gateway can arise either in the context of a strategic growth location to the east of the Southern Bypass or in the form of a more limited urban extension, drawing upon that element of Policy 5 of the Technical Consultation which anticipates the construction of 2,000 dwellings on the "South Norfolk smaller sites."

4.8. It is important for the Joint Core Strategy to devise a framework which will enable the required degree of economic change to arise in the most effective manner. Whilst it is important to safeguard existing employment sites, it is equally necessary to allocate sufficient quantities of employment land of the appropriate quality and in the right locations to meet the needs of inward investment, new businesses and existing firms wishing to expand or relocate. Norwich City Centre will continue to exert a powerful economic influence over the Norwich Policy Area but significant locations at the edge of the City, such as the general area of the proposed Norwich Gateway, will increasingly be required to facilitate the enhancement of the local economy.

4.9. The quality of land to meet the needs of business is one of the critical



	<p>factors in ensuring economic success and attracting inward investment. The Joint Core Strategy must ensure that there is a high quality offer of employment land to underpin the growth status of the Norwich area. In that wider context, we agree with the Technical Consultation which notes that locations such as Cringleford/Colney will be the focus of further employment growth.</p> <p>4.10. Policy 15 of the Technical Consultation requires that sufficient employment land be allocated in locations consistent with the "Spatial Hierarchy policy to meet identified need and provide for choice." The Norwich Gateway approach proposed by our clients will contribute to the provision of a choice and range of sites. The Gateway concept supports the outcomes described at paragraphs 8.12-8.14 of the Consultation.</p>	
7736	<p>Kimberley & Carleton Forehoe Parish Council Again a need for the linking up of the NNDR and the A47. The investment in infrastructure required to make Wymondham a 'main town' would make it expensive.</p>	
7829	<p>NHS Norfolk From a health perspective, the main impact will be on primary and community healthcare facilities. Some additional capacity is currently being provided in Wymondham. New facilities are being considered in Diss. We will need to review capacity in these towns, but unlikely to be significant infrastructure requirements at these levels of growth.</p>	
7844	<p>Scott-Brown Partnership This representation is concerned with Diss only. It is an accessible and sustainable settlement with a direct rail link to Norwich and Ipswich and a well developed employment and retail base..</p> <p>Yet, once again, it is not considered as suitable for growth which meets more than locally-generated needs. Diss has clear advantages over towns such as Harleston in terms of its accessibility and its present level of infrastructure and this should be recognised in any strategy which seeks to bring about a sustainable and economically efficient pattern of development</p>	
7864	<p>Wymondham Town Council Provision of a Bus hub and suitable coach park. At present the designated coach parking area is a reasonable distance away from the Town Centre in a lorry/car park. If possible this should link in with the railway station.</p>	



Q19 What opportunities can growth bring?		
	There were 19 responses to this question.	
	Issues mentioned include enhanced status for Diss, increased sustainability for Aylsham, the retail hierarchy, policing, town centre improvement, green infrastructure, increased sustainability, jobs/employment, status of Long Stratton and increased early housing allocations. Communities mentioned include Diss, Harleston, Beccles, Aylsham, Wymondham and Long Stratton.	
6857	Anглиan Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6941	Thos. Wm. Gaze & Son Enhanced status in the region for Diss, based on its strategic position with a large catchment area, a mainline rail station, and good road links via the A140, A143 and A1066. An enhanced retail offer for the town centre based on quality local retailers, as found in Harleston and Beccles, would improve the image, rather than edge-of-town development at Park Road South which will inevitably attract car-based shoppers who are not encouraged to walk into the town centre because of having to cross Victoria Road.	
6993	Michael Haslam Associates Ltd The growth we are proposing for Aylsham will allow the town to increase its social and economic sustainability by making better use of its existing underused infrastructure, providing sustainable new houses with a range of house sizes, types and tenure, including 40% affordable and key worker housing leading to additional spending power in the local economy. The development will provide open space within the site and has the capacity to provide enhanced public access to the riverside area.	
7040	DPP We would broadly support the retail hierarchy suggested within the Issues and Options paper. In particular, we would support the identification of Diss as a 'Town and Large District Centre': the centre is the largest town in South Norfolk, and benefits from good accessibility. Furthermore, it provides a range of services and facilities and serves an extensive rural catchment. The allocation of the centre is therefore consistent with the advice in PPS6 'Planning for Town Centres'.	
7069	Norfolk Constabulary The proposed levels of growth at Aylsham, Diss and Harleston are catered for by good Police Station facilities. However, additional resource may be required to support front line policing. Higher levels of growth proposed for Wymondham will have an impact on Police resources. Additional resources will be required for the Safer Neighbourhood Team.	
7087	Hevingham Parish Council Local job opportunities	
7114	Tesco Stores Ltd Growth will inevitably lead to town centre improvements and as a result greater settlement self sufficiency. The cycle becomes self reinforcing as less people choose to leave the town for services/facilities, and more money is reinvested back into the town	



7178	<p>Hopkins Homes Ltd The role that the existing market towns of Harleston and Diss, together with many of the larger settlements within the wider rural surroundings can play by accommodating a significant proportion of this growth should therefore not be underestimated.</p> <p>It is pleasing to note that via Policies 6 to 8 of the current Technical Consultation document, there appears to be some acknowledgement of this fact, with a slight increase in the numbers of new dwellings now proposed for the market towns and larger villages put forward by the Partnership compared to the stance suggested within the previous 'Issues & Options' Consultation. However, in view of the aforementioned circumstances, Hopkins Homes is of the view that additional scope exists to further increase the proportion of new dwellings to be developed within these settlements</p>	
7203	<p>Persimmon Homes In relation to Wymondham, this option offers a strategy that spreads the new development around the town in a larger number of smaller developments and therefore presents the opportunity of less risk of delay and better use of existing infrastructure, whilst offering the opportunity to share the costs of any essential new infrastructure between various developers. The much shorter lead in period and spread of site and developers would also mean that it would be possible to take full advantage in due course of an improved housing market to achieve the delivery of the required increase in housing.</p>	
7289	<p>Bidwells Wrenbridge (Harts Farm) Ltd support the identification of Wymondham as a 'location for major change and development in the Norwich Policy Area (NPA)'. Wrenbridge (Harts Farm) Ltd contend that whichever growth option/scenario is taken forward by the GNDP, there will be a need for the release of further commercial land at Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that the release of employment land at Wymondham is not only necessary to support an expanded settlement, but to help address the Wymond ham's current imbalance between homes and jobs and reduce the travel to work distances currently experienced in the town. Existing sites such as Ayton Road and Gateway 11 are currently full or very close to being fully occupied, with the majority of the other Wymondham sites identified in the Greater Norwich Employment Growth Sites and Premises Study being of a smaller scale and offering more limited scope for comprehensive development proposals. Potential other larger scale sites are contingent on major housing and infrastructure proposals coming forward, such as the Peigham Homes proposal for South Wymondham.</p> <p>Wrenbridge (Harts Farm) Ltd suggest that in light of the limited alternative options, the land at East Wymondham (Browick Road) offers the best and most deliverable option for new commercial premises, particularly in the shorter term given its location, recent planning history and the lack of constraints. The site is also better connected to the Trunk Road and Railway network than other Wymondham locations identified in the Greater Norwich Employment Growth Sites and Premises Study and therefore potentially more attractive to businesses.</p> <p>Wrenbridge (Harts Farm) Ltd do not agree with Arup's Employment</p>	



Growth Sites and Premises Study's suggested approach that seeks to protect existing and allocated employment sites for employment uses, and its suggestion to focus all new employment uses to these existing sites. In Wrenbridge (Harts Farm) Ltd experience, inevitably over time certain employment premises and locations become out dated and no longer fit for purpose and lend themselves to different uses. Indeed, re-using no longer fit for purpose employment sites is a key plank of Government Policy (PPS3). This approach is already happening in the GNDP area, particularly in the City. For instance, the City Council's decision to grant permission on the Wensum Clothing site on Northumberland Street in Norwich is a good example of this process in action. In Wymondham's case, the fact that certain Local Plan allocations have yet to be developed would seem to indicate that their attractiveness to businesses is questionable and they might be better used for other uses. Also, the success of Gateway 11 would indicate the attractiveness of commercial premises with easy access to the trunk road network, and consequently the need to allocate similar sites for development.

Wrenbridge (Harts Farm Ltd) are encouraged by the emerging Core Strategy Policy 15, which seeks to identify new allocations consistent with the spatial hierarchy. However, Wrenbridge (Harts Farm) Ltd suggest that the Core Strategy's growth options (Appendix 1-3) should be also be more explicit about the need to provide for more commercial land at Wymondham, in line with the approach in Policy 15 and in order to help create a better balance between jobs, homes and facilities.

Wrenbridge (Harts Farm) Ltd also suggests that the Core Strategy should be more flexible and allow a framework for the release of no longer 'fit for purpose' employment sites to other uses, particularly where there are other options for new employment sites coming forward through the LDF process.

Evidence submitted by Wrenbridge (Harts Farm) to the previous Core Strategy Issues and Options consultation in February 2008, in support of the East Wymondham Commercial Development Area helps to demonstrate the suitability of the location for development. Further copies of this evidence can be made available on request. In summary: The East Wymondham Commercial Development Area Planning Statement (Wrenbridge & BidweNs, Jan 08) provides evidence of the main planning issues relevant to the land at East Wymondham (Browick Road). It confirms that there are no national, European, international, regional or local designations within the area and it is largely unconstrained by significant Local Plan policies. Also, the evidence demonstrates that there is no grade 1 or 2 agricultural land present; that much of the landscape character is relatively low in value and has been affected in places by agricultural activity and/or is affected by the A1 trunk road, railway and commercial and residential activity. It also confirms that part of the land has had the benefit of planning permission for a commercial use and part of the land is currently allocated for rail freight related activity, giving a further indication of the Council's acceptance of development in the area.

The Planning Statement also identifies the 'sustainability objectives', that development at East Wymondham could address, including ensuring inclusive, safe, health and active development; environmentally and culturally sensitive development; well designed and built development;



well connected and well served development; thriving and delivered on time.

The Design and Landscape Statement (Wrenbridge & Bidwells, Jan 08) provides evidence of the main landscaping and visual aspects related to land at East Wymondham (Browick Road). It concludes that the general quality of the landscape in the area can be described as mostly 'ordinary' with smaller areas of 'good' quality landscape, with variable views towards the site depending on topography and local screening. The statement demonstrates that the landscape has the capacity to accommodate growth in this area, without undermining the general landscape character of the wider area or nearby conservation areas, It confirms that landscape and design features can be put in place to mitigate any localised landscape impacts.

The East Wymondham Commercial Development Area Vision and Development Principles Document (Wrenbridge & Bidwells, Jan 2008) demonstrates the overall vision for the area and the principles that will be adopted in drawing up more detailed design proposals to ensure that the development contributes to sustainable development. Evidence is provided to demonstrate how the area's development would contribute to addressing a number of economic, social and environmental issues prevalent in Wymond ham. An initial design concept is also put forward that responds to the site context and local issues and provides a starting point for more detailed work.

Conclusion

In conclusion, Wrenbridge (Harts Farm) Ltd contend that the principle of employment development on part of the site has already been accepted and a substantial part of the area already has had the benefit of planning permission for a business specific' employment use. Although the proposal was never implemented, it was supported by a number of technical reports and assessments that help to demonstrate that a substantial employment use can be accommodated on part of the area.

The broad infrastructure capacity and requirements have been investigated and are to a great extent known. Also key archaeological and ecological features for part of the site have already been identified. These studies will need to be refreshed and further studies will be commissioned to consider the wider area. However, the existing information confirms that in broad terms that the area is not fundamentally constrained by major infrastructure requirements, including access.

It is accepted that flood risk and drainage will need careful consideration through the consideration and preparation of more detailed development plans and proposals, as does archaeology and ecology.

The land is not constrained by multiple ownerships and is available for immediate development. The landowners are committed to helping Wymondham to grow and flourish, and are keen to contribute to Wymondham's future development. The developer, Wrenbridge will ensure that the land is planned and implemented as a single entity, including the provision of necessary infrastructure. Wrenbridge already has a proven track record of delivering strategic employment sites,



	including Gateway 11 in Wymondham. A detailed masterplan will be prepared, perhaps in conjunction with the Greater Norwich Development Partnership. This masterplan will be underpinned by more detailed technical studies, such as drainage, archaeology and ecology covering the whole area. The masterplan could be prepared as a formal Supplementary Planning Document (SPD), linking to the Core Strategy, or a more detailed Site Specific Allocations Development Plan document (DPD). Linking direct to the Core Strategy, rather than waiting for the Site Allocations DPD, will expedite the delivery of the land. The masterplan will provide sufficient certainty to inform the preparation of a detailed planning application for the area.	
7379	I E Homes and Property Ltd Jobs	
7444	Environment Agency (Eastern Area Office) The provision of green infrastructure should be considered at an early stage. Open green spaces can be created throughout Wymondham, especially along the River Tiffey and Bays River corridors, as well as within and between development.	
7473	Hethersett Parish Council No comment	
7488	Ingleton Wood Increased sustainability, including that of neighbouring villages Improved quality of life due to the provision of new jobs, services and facilities Opportunities for regeneration	
7596	Redenhall with Harleston Parish Council Growth could bring the opportunity for more employment locally and the Industrial Estate which has spare capacity at present could be encouraged to take up this market. The Industrial Estate area has already been earmarked to take an extra 90+ homes and this encroaches onto the space required for employment opportunities.	
7737	Kimberley & Carleton Forehoe Parish Council Limited as the existing environment makes development hugely expensive. Long Stratton should replace Wymondham as a 'main town', where there a real opportunities to create an award winning new town.	
7773	Entec UK Hopkins Homes welcome the fact that Wymondham is identified as a main town and as a growth location. As previously discussed Wymondham can accommodate a higher level of growth, than proposed in the options. There are opportunities within Wymondham to integrate growth into the existing settlements. Hopkins Homes site to the South of Wymondham has strong sustainability credentials (see separate appraisal in Appendix A), and can be delivered in the short to medium term. The allocation of this site would create a high quality sustainable urban extension to Wymondham.	



7845	<p>Scott-Brown Partnership Making better use of well-developed existing infrastructure, adhering to PPS3 guidance in concentrating growth at existing urban centres. A housing allocation higher than the notional 300 attached to each Option would be beneficial to meeting housing allocations in the early years of the Strategy before the ambitious large Greenfield allocations and new settlements come forward. In any event, an allocation of 300 houses over a 20 year period would not even meet locally-generated housing needs so in effect any excess of demand would have to be overspilled to the NPA growth areas. Since Diss already has a well-developed economic and social infrastructure this would be perverse</p> <p>If the allocation were to be increased, say to 500, this would enable a choice of housing sites to be brought forward for relatively early implementation.</p> <p>In this context we suggest that land immediately to the north of the recently completed housing site at Mission Road (Persimmon site) and land north of Frenze Hall Lane be identified as sites which can meet general and affordable housing needs in the first few years of the strategy.</p>	
7865	<p>Wymondham Town Council It is perceived that population growth will attract more businesses to the town and will provide a wider range of employment opportunities. There will also be the opportunity for more retail units, possibly a small edge of town retail park.</p>	



Q20 What are the constraints to delivering the proposed level of growth and how can these be overcome?		
	There were 15 responses to this question.	
	Issues mentioned include traffic flows, Aylsham STW capacity, the economic climate, SSSIs and nature reserves, archaeological sites, transportation, infrastructure and land availability. Communities mentioned include Aylsham, Harleston, Diss, and Wymondham.	
6858	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6942	Thos. Wm. Gaze & Son Traffic flows	
6994	Michael Haslam Associates Ltd The only constraint that has been identified is the capacity of the Aylsham STW. With the sustainable aspirations of the development in mind it might be more appropriate to provide a new treatment plant on site re-using grey water supplemented by rainwater harvesting for flushing within the buildings. This could lead to a reduced volume of foul water requiring treatment and treated effluent. Millard Consulting has been commissioned to investigate these issues and their preliminary views are set out in the attached e-mail dated 24 September 2008.	
7011	Natural England See above, plus: For Harleston - Gawdyhall Big Wood SSSI For Aylsham - Cawston & Marsham Heaths SSSI and Buxton Heath SSSI (part of Norfolk Valley Fens SAC) For Diss - Wortham Ling SSSI (already subject to heavy visitor pressure and recreational use by dogwalkers); Gypsy Camp Meadows, Thrandeston SSSI; Shelfanger Meadows SSSI and Royden Fen and Frenze Beck LNRs	
7088	Hevingham Parish Council Economic climate	
7096	Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.	
7024	Persimmon Homes In relation to Wymondham, concentrating urban expansion and an additional 4000 dwellings in one part of the town will require considerable investment in associated infrastructure, which will be largely reliant upon the rate of development in this location to be funded and implemented. Development on this scale will not only have a long lead in time but will also take some time to develop. Changing market conditions could also affect the rate of completions. There is therefore the risk that the dwellings and infrastructure will not be delivered in the required timescale. A strategy that spreads the new development around the town in a larger number of smaller developments carries less risk of delay and can make better use of existing infrastructure, whilst offering the opportunity to share the costs of any essential new infrastructure between various developers. The much shorter lead in period and spread	



	of site and developers would also mean that it would be possible to take full advantage in due course of an improved housing market to achieve the delivery of the required increase in housing.	
7380	I E Homes and Property Ltd Infrastructure and infrastructure improvements needed	
7445	Environment Agency (Eastern Area Office) See response to Question 18.	
7474	Hethersett Parish Council No comment	
7489	Ingleton Wood Transportation Cost of delivering most appropriate renewable energy options Objections from local residents Formation of partnerships with developers and others Inclusive consultation	
7516	Bidwells As described in the answers above, Kier Land Ltd believes that the only significant constraint to delivering growth of 300 dwellings in Aylsham is the delivery of improvements to the local wastewater infrastructure capacity (the need for new water supply infrastructure being a high cost for all Main Towns and Key Service Centres). It is apparent that this constraint can be overcome by 2016 if suitable housing numbers and sites are included in the Joint Core Strategy/Site Allocations DPD (i.e. Anglian Water will provide the infrastructure). Other constraints are likely to be site-specific and relatively minor, which would be overcome through normal Section 106 agreements and planning conditions. Kier Land Ltd has already undertaken a considerable amount of technical work to underpin the release of the land, and has signed an option agreement with the landowner. Details of the site have been previously sent to Broadland District Council. The information contained in the SHLAA profile is accurate except as follows: <ul style="list-style-type: none"> • Site size: 8.5 ha • Assumed capacity: 200-300 dwellings • Highway improvement: improvements to the junction of Burgh Road and the A140 will be needed, but these can be secured from within the limits of the public highway (please see attached Transportation Supporting Statement (prepared by Woods Hardwick) for further details) • Site available: immediately • Release phase: within years 6-10, unless the wastewater infrastructure constraints can be overcome sooner. 	
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	<p>that this constraint can be overcome by 2016 if suitable housing numbers and sites are included in the Joint Core Strategy/Site Allocations DPD (i.e. Anglian Water will provide the infrastructure). Other constraints are likely to be site-specific and relatively minor, which would be overcome through normal Section 106 agreements and planning conditions.</p> <p>Kier Land Ltd has already undertaken a considerable amount of technical work to underpin the release of the land, and has signed an option agreement with the landowner. Details of the site have been previously sent to Broadland District Council. The information contained in the SHLAA profile is accurate except as follows:</p> <ul style="list-style-type: none">• Site size: 8.5 ha• Assumed capacity: 200-300 dwellings• Highway improvement: improvements to the junction of Burgh Road and the A140 will be needed, but these can be secured from within the limits of the public highway (please see attached Transportation Supporting Statement (prepared by Woods Hardwick) for further details)• Site available: immediately• Release phase: within years 6-10, unless the wastewater infrastructure constraints can be overcome sooner.	
7738	Kimberley & Carleton Forehoe Parish Council The original constraints of Wymondham do not make it easy to extend and develop in a cohesive manner.	
7774	Entec UK We welcome the fact that the Core Strategy acknowledges the constraints at Aylsham, Diss and Harleston for growth. Wymondham is an appropriate 'main town' for growth. As a result the site put forward by Hopkins Homes should be allocated to facilitate the growth.	
7866	Wymondham Town Council Availability of suitable land, particularly in the town centre, which is accessible to ensure that development will encourage positive growth. Should this not take place new residents will technically live in Wymondham but in reality be in a separate settlement with no sense of culture or heritage.	



Q21 How could growth in main towns link with your longer term investment strategies?	
	There were 14 responses to this question.
	Issues mentioned include exclusion of Attleborough, providing a “critical mass” for future investment and retail, sustainability in Diss, a cross-city development corridor. Communities mentioned include Diss, Attleborough, Norwich, Ipswich, Bury St Edmunds, Lowestoft, Great Yarmouth, Costessey, Easton, Aylsham and Wymondham.
6859	Anглиan Water Services Ltd Refer to Water Cycle Study Stage 2A report
6913	Little Melton Parish Council It is illogical to include Diss in the plan but exclude Attleborough - a town that has good road and rail links to both Norwich and Cambridge! Surly it would be sensible to put some new housing at Attleborough?
6943	Thos. Wm. Gaze & Son It would provide a 'critical mass' for further investment, in what is otherwise considered a rural area where growth is concentrated in the major centres such as Norwich, Ipswich, Bury St Edmunds, Lowestoft and Great Yarmouth.
7115	Tesco Stores Ltd Tesco's existing store at Diss is designed to serve the surrounding community. Growth in the vicinity of the store would encourage investment in it.
7194	<p>Indigo Planning Ltd. Sainsbury's have three stores in the area covered within the Core Strategy at: Broadland, Pound Lane (Dussindale); Norwich, Longwater Lane; and Norwich, Queens Road. Sainsbury's are interested in improving their existing representation in the Joint Core Strategy Area and are, therefore, keen to be involved in the LDF process.</p> <p>We note that Policy 5 of the document nominates the Costessey/Easton area as a location for major change and development within the Norwich Policy Area. Policy 12 of the document qualifies this designation by stating that "new district centres / high streets to be established at the proposed major growth locations within the Norwich Policy Area."</p> <p>We support the proposed designation of Costessey/Easton as a location for major change and development and welcome the allocation of 2,000 dwellings to the area. In relation to the proposals of Policy 12, we consider that the existing Sainsbury's store at Longwater Lane is well established and suited to act as a focal point to anchor further retail development within the area, and on this basis warrants designation as a District Centre to serve the Costessey/Easton area of major change and development.</p> <p>In particular, we note that the store is centrally located within this growth area and is easily accessible in the existing highway network. Furthermore, the store already offers a wide range of goods and services. These factors offer clear support for a District Centre designation for this store. The designation of a District Centre will encourage the improvement of community facilities in the area.</p>



	<p>Policy 12 identifies Norwich City Centre as the Primary Centre within the hierarchy of centres. Policy 5 of the document allocates a housing provision target of 4,000 dwellings to Norwich City Centre. Policy 5 also allocates 2,000 dwellings to smaller sites within South Norfolk, which is adjacent to Norwich City Centre.</p> <p>The Retail and Town Centres Study (October 2007) identifies the potential capacity for 3,567m² of new modern superstore floorspace in 2011; rising to 5,199m² in 2016; and rising to 6,981 m² in 2021. We consider that recognition should also be given to the potential for improvements to existing stores to accommodate this growth, such as the Sainsbury's Queens Road store, which currently serves Norwich city-centre as well as South Norfolk.</p> <p>Sainsbury's is committed to implementing ongoing improvements to the retail offer in the Joint Core Strategy Area and we look forward to meeting the Council's Policy team to discuss these aspirations.</p>	
7243	Mr Richard Atkinson The planned growth in Aylsham could benefit from better quality public transport in the A140 corridor. Residents would be able to take advantage of enhanced park and ride provision at the Airport which forms part of our	
7381	I E Homes and Property Ltd It will not.	
7475	Hethersett Parish Council No comment	
7490	<p>Ingleton Wood Diss is identified as a main town to accommodate additional housing, expanded town centre uses and additional employment. This will ensure the sustainability of new private and affordable housing developments in Diss and its rural catchment.</p> <p>Green transport links could be enhanced to promote green travel to work from the neighbouring villages</p>	
7546	Mr Richard Atkinson The planned growth in Wymondham would help to develop the concept of a cross city development corridor with integrated high quality public transport by different modes. Our proposed development at Colney Lane would support, and benefit from, this concept.	
7633	CGMS Ltd The planned growth in Wymondham would help to establish the concept of a cross city development corridor, with integrated high quality public transport by different modes	
7739	Kimberley & Carleton Forehoe Parish Council No links	
7775	Entec UK As previously stated Hopkins Homes interests relate to land south of Wymondham, where Hopkins Homes could deliver a high quality residential led mixed use scheme, including employment uses, affordable homes, and the public open space. Hopkins Homes seek an allocation for this site within the housing requirements for Wymondham. The allocation of this site would meet the policies set out in the Joint Core Strategy, as well as RSS and PPS3.	
7846	Scott-Brown Partnership It would enable a steady flow of land to be secured in Diss from our clients point of view and would also enable development to be assimilated at a lower level of public infrastructure cost than reliance on new settlements.	



Q22 What additional significant infrastructure requirements would there be?		
	There were 30 responses to this question.	
	Issues mentioned include infrastructure, growth in Hingham, policing, a new inner link road, transportation/ road issues, capacity in Hethersett, housing in Poringland and Framlingham Earl, status of Wroxham and Hoveton, sewer networks, housing allocations, strategic growth, status of Berge Apton and capacity of Long Stratton. Communities mentioned include Hingham, Ditchingham, Aylsham, Diss, Harleston, Wymondham, Wroxham, Hoveton, Brundall, Loddon, Acle, Blofield, Brundall, Hethersett, Hingham, Loddon, Chedgrave, Long Stratton, Poringland, Framingham Earl, Reepham, Wroxham, Cringleford, Mulbarton, Poringland, Rackheath, Trowse, Salhouse, Spixworth, Alington, Yelverton, and Berge Apton.	
6823	Acle Parish Council Infrastructure needed - additional sewerage capacity, new buildings at the primary and high schools, additional funding for healthcare services.	
6860	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6867	Hingham Parish Council Although Hingham is a small rural centre with a range of basic shops and services serving the everyday needs of the current population, a growth of another 100 dwellings would considerably stretch the current services. A recent planning permission to double the size of the existing nursing home has brought complaints from the doctors surgery that they could not cope and existing clients will suffer. 100 dwellings would bring at least 200 new patients on top of the new admissions at the nursing home. These new properties could bring in more families which could increase the number of children on roll at the local primary school. This is an excellent school but the building is old and not designed for large numbers of children. Funding would be needed to enlarge some of the facilities. The library is another service that would need extra funding to cater for the needs of extra residents. The possible implications on the water pressure and surface water drainage are obvious. The water pressure in some parts of the town is already low and at certain times of the day, non-existent. Another 200 properties all using water at the same times & the day would have a detrimental affect. Parts of the town are already prone to flooding during heavy rainfall. The surface water from more properties would only add to the problem.	
7074	Mr J Peacock We are instructed by the Ditchingham Estate to make representations in response to the Council's publication as detailed above and to formally put forward further points in support of two Land Bid representations which were submitted to South Norfolk District Council in December 2005. In making the following representations we have taken into account all relevant extant and emerging national Planning Guidance/Statements and in particular Planning Policy Statement 1, Planning Policy Statement 3, Planning Policy Statement 7 and Planning Policy Guidance Note 13. At the regional level we have taken account of the East of England Plan which was adopted this year.	



7100	<p>Persimmon Homes Our clients and adjoining landowners acknowledge the need for new infrastructure to support the growth of the city, including those identified by the Council, which relate to the need for new transport, social and utility/service infrastructure. Such infrastructure includes facilitating the completion of a new inner link road from Wroxham Road to the Broadland Business Park so enhancing connectivity. Coordination of a range of public and private sector organisations will be necessary in order to deliver the infrastructure required.</p>	
7167	<p>Bidwells Gladedale support the identification of Wroxham as a Key Service Centre and the principle of the allocation of at least 200 dwellings at Wroxham.</p> <p>Wroxham is a large village with a wide range of jobs and services associated with the holiday industry. There are existing primary and secondary schools in the area. Therefore Gladedale considers that it is wholly appropriate that the village is allowed to grow to meet the housing and employment needs of the local area and further underpin existing services and facilities and potentially attract new ones.</p> <p>The Core Strategy is correct to identify Key Service Centres which need to continue to accommodate levels of growth appropriate to their size, role and function in order that they maintain their important purpose of service centres serving rural communities. As such a housing allocation at Wroxham is consistent with its Key Service Centre designation.</p> <p>Gladedale suggests that in line with the East of England Plan (Regional Spatial Strategy), that growth targets for the Key Service Centres should not be expressed as ceilings to development, rather that they are minimum targets to be achieved and go beyond in appropriate circumstance, such as to achieve sustainability objectives and to deliver mixed and balanced communities. This would reflect policy Hi of the East of England Plan.</p> <p>Land on the southern boundary of Wroxham offers the best opportunity for integrating new development to accommodate this growth (refer to attached plan), and a detailed appraisal will be undertaken in order to identify the specific site within this area of search. The area offers good accessibility for future residents to existing services and facilities within Wroxham and neighbouring Hoveton.</p> <p>Trafford Estates own this land which immediately bounds the southern boundary of the urban area. There are no known extraordinary infrastructure requirements which would be needed to bring forward this land and therefore it would be the most suitable location to accommodate this growth</p>	
7219	<p>Salhouse Parish Council Wroxham/ Hoveton would require improved road access or a bypass. Others - no comment</p>	



7258	<p>Persimmon Homes Re: GNDP CONSULTATIONS COLAND SITE NORTH OF LINKS AVENUE, BRUNDALL</p> <p>These representations have been made in relation to the above site in response to the technical consultation exercise on the joint core strategy and the consultation on The Joint Strategic Housing Land Availability Assessment (SHLAA).</p> <p>Response to Joint Core Strategy Technical Consultation- The site north of Links Avenue was allocated in part in the South Norfolk Local Plan for recreational! public open space uses. To date however as a free-standing proposal, this facility remains outstanding and still to be delivered. The GNDP technical consultation document identifies Brundall as a key service centre being a village offering a range of facilities enabling them to meet local needs as well as the needs of residents of surrounding areas. With specific regard to Brundall the report acknowledges that the village has a limited range of dispersed shops and services and is a major centre for boat yards. It continues to identify that the village is deficient of recreational facilities and this issue needs to be rectified. Notwithstanding that the village equally offers educational and good public transport links including two railway stations, within the category of key service centres only a modest housing growth of approximately 20-50 dwellings is proposed.</p> <p>Whilst we would support the identification of Brundall as a key service centre we consider that the growth of 20-50 dwellings as proposed in the core strategy is artificially low particularly in comparison with other settlements in the same category with lesser public transport or connections available to strategic transport links and established employment centres. We therefore consider that the scale of growth attributed to Brundall should be increased to being between 100-200 dwellings in line with a number of similar centres.</p> <p>As indicated above the GNDP report identifies a short fall in recreational facilities in the village which has been a long standing issue which remains unresolved. Part of the land identified with the submission is that which has previously been suggested as the most appropriate location for this delivery however clearly the economics of securing this land and providing this facility have to date denied delivery. The clear opportunity exists as part of the GNDP review to seek such delivery cross funded from the allocation of adjoining land within this parcel for residential purposes thus delivering a real planning gain to the village, one that has been sought for in excess of 10 years. Without such cross subsidy delivery of this much needed resource is likely to continue to be beyond delivery.</p> <p>A real opportunity exists within this review to resolve this identified deficiency in provision whilst equally delivering additional housing units to meet the needs of the village. Whilst the ultimate number of units required to be allocated in order to secure delivery of the open space area is a matter for consideration at the site specific stage, the increase in overall numbers as identified above would provide greater flexibility in order to achieve this goal.</p> <p>In summary we support the identification of Brundall as a key service centre but suggest that an increase in anticipated housing delivery of</p>	
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	<p>between 100-200 dwellings should be identified. The site as identified has the ability to deliver the deficiency of recreational facilities within the village in a location well related to the existing village hall delivery of which can be secured by the allocation of an appropriate amount of residential allocation upon the adjoining land. A willingness exists on behalf of the landowner to work together with the District Council and community to formulate such a proposal thus guaranteeing delivery of the long standing short fall in recreational public open space provision.</p>	
7262	<p>Barton Willmore No 'significant' new infrastructure would be required in order to develop the site at George Lane, Loddon. Upgrades to water supply and sewage disposal may be necessary to service the additional dwellings but as noted in paragraph 1.6 above should the site be allocated for residential development, Angliari Water would be obliged to take this into account when planning their five yearly upgrades. Phillip Jeans Homes would expect to make appropriate contributions to essential and local supporting infrastructure through negotiations with the local planning authority at the planning application stage.</p>	
7271	<p>Bidwells</p> <p>Gladedale (Anglia) Ltd believes that to deliver a minimum of 200 new dwellings in Hetherset, there would be no significant infrastructure improvements needed. As an example, Gladedale's site, land north of Great Melton Road, could accommodate approximately 180 dwellings. There is predicted to be sufficient spare capacity in Hetherset's nursery and high schools to accommodate expected numbers of children from such a development, and Hetherset Junior School would only be above capacity by a relatively small number of pupils (circa 13).</p> <p>Initial infrastructure capacity assessments have been undertaken, and there is believed to be adequate capacity in Hetherset's existing electricity, gas and water supply networks to adequately service growth of 200 dwellings. Foul drainage/waste water treatment capacity in Hetherset is also likely to be sufficient for the delivery of 200 dwellings, although Anglian Water has advised that some local improvements to the foul sewers in the vicinity of Gladedale (Anglia) Ltd's site would be needed.</p> <p>Consultation was undertaken with the Primary Care Trust during the early stages of the preparation of the South Norfolk LDF and the PCT indicated that a Group Practice covers Hetherset, Cringleford and Mulbarton, with three premises. At the time of the consultation, the PCT indicated that expected expansion of the Cringleford surgery would release sufficient capacity to allow a development of 180 dwellings in Hetherset. They confirmed that, subject to satisfactory progression of the Cringleford expansion plans, they did not foresee any obstacle to meeting the healthcare needs of the proposed development.</p> <p>A Transport Assessment of Gladedale (Anglia) Ltd's site (carried out in 2006) concluded that Hetherset had excellent public transport connections to and from Norwich and that additional traffic generated by a development of c.180 dwellings could "easily be accommodated on the local road network in terms of traffic capacity". A copy of the TA has previously been submitted to South Norfolk Council.</p>	



7306	<p>Michael Haslam Associates Ltd. We object to the proposal in policy 7 that there should be no further allocations for new housing in Poringland/ Framingham Earl. The existing housing commitment is largely on one large site and there is a need for a range of sites to satisfy the requirements of the smaller builder and to ensure deliverability, which is clearly a major problem with the allocated sites.</p> <p>The site, plan attached, adjoining Pigot Lane and Oaklands has a positive surface water drainage system via an existing network of ditches flowing to the north east which can be used to resolve some of the existing surface water drainage problems in the area in addition to providing the route for surface water drainage from the site.</p> <p>The High School has identified a need for additional playing fields and the proposed development makes provision for land at no cost to the public purse to extend the school playing field.</p> <p>The proposal also provides the opportunity to improve public access to Poringland Wood.</p> <p>The Consultation Document identifies a requirement for a new employment area to serve the parish and this proposal identifies a site for a new employment area. The new employment area will require a new junction with Pigot Lane and the standard infrastructure for an employment area of water, roads, foul and surface water sewers, electricity, gas and telecommunications.</p>	
7332	<p>North Norfolk District Council NNDC also note the proposed designation of Wroxham as a Key Service Centre, which is consistent with the identification of Hoveton as a secondary settlement, in the North Norfolk Core Strategy. The allocation of 100-200 dwellings in Wroxham needs to be planned in a coordinated manner with the Hoveton allocation in the North Norfolk Site Specific Proposals DPD, particularly in relation to infrastructure provision, including highway capacity.</p>	
7382	<p>I E Homes and Property Generally road and public transport improvements as many are poorly serviced by road network and public transport.</p>	
7446	<p>Environment Agency (Eastern Area Office) An assumption has been made within stage 2 of the WCS that all sewer networks are at capacity and therefore costs and timings will need to be factored into any future growth.</p>	
7476	<p>Hethersett Parish Council Sewerage improvements necessary. School capacity. Health provision, particularly for the growing elderly population. Road improvements.</p>	
7506	<p>Carter Jonas It seems logical to make the best use of existing infrastructure when considering suitable locations for development. However, the proposed split of housing numbers between the different key service centres does not appear to reflect this. Additional infrastructure is both costly and causes delay.</p> <p>E.g. At Reepham where schools and sewerage system are at capacity the proposed allocation is 100-200 dwellings. This would mean considerable investment is needed for a relatively small number of new houses and it is</p>	



	<p>questionable whether, given this, development would ever come forward.</p> <p>Acle, Hingham, Loddon and Reepham are all allocated 100-200 houses but, as highlighted in the justification, all have significant infrastructure constraints.</p>	
7512	<p>Keymer Cavendish</p> <p>6.4 Page 27 - Policies for places</p> <p>Policy 1: Settlement hierarchy We repeat our reservations about strategic scale growth divorced from Norwich itself. In our view neither Wymondham nor Long Stratton should be identified for strategic growth.</p> <p>6.5 Policy 2: Strategy for growth in the Norwich Policy Area We endorse the proposal to extend the Broadland Business Park. We also note that the plan period for the NPA is to run to 2026 in order to provide a 15 year supply of housing (albeit not all accurately identified) by the time the Plan is adopted. We endorse the proposal for new rail halts at the Broadland Business Park and at Rackheath together with innovative new services on the Wroxham-Norwich line. We have our doubts about the practicality of this on the Norwich-Wymondham line.</p> <p>6.6 Page 31 Policy 4: The remainder of the Norwich urban area, including the parish fringes. We endorse the significant enhancement of public transport including the bus rapid transit network along the routes identified on page 31.</p> <p>6.7 Page 33 Policy 5: Locations for major change and development in the Norwich Policy Area. We endorse the high standards to be sought in the new neighbourhoods and particularly support the six bullet points early in this policy addressing sustainability, self-containment, cycling, SUDS, energy generation, schooling, communications and infrastructure.</p> <p>6.8 Page 38 However, as stated previously, we do not support the dispersal policy of locating strategic growth to Wymondham and Long Stratton and emphasise again the desirability of the Rackheath rail corridor.</p> <p>6.9 Page 44 Policy 12: The hierarchy of centres The policy of establishing district centres within the proposed major growth locations is supported but, in view of the importance of this, one feels that this category should be number 2 in the list, not number 4.</p> <p>6.10 Page 47 Policy 13: Reducing environmental impact We endorse wholeheartedly the target of reducing environmental impact both in terms of recycling, energy efficiency and in minimising the need to travel - 'living at your destination.'</p>	



	<p>6.11 Page 48 Policy 14: Housing delivery In view of the fragility of the housing market, this policy needs to be less prescriptive, particularly in terms of housing mix and affordable housing - viz: see deletions:</p> <p>Housing mix Proposals for housing will be expected to contribute to the mix of housing required to meet the needs of the area, as set out in the most up to date study of housing need and the Housing Market Assessment.</p> <p>Affordable Housing A proportion of affordable housing, including an appropriate tenure-mix, will be required in accordance with the most up to date needs assessment for the plan area, on sites of 5 or more dwellings (or 0.2 hectare or more).</p> <p>6.13 Page 57 Policy 19- Implementation and monitoring We endorse the concept of employing compulsory powers where necessary, particularly for site assembly and for access. We question whether funding for the future maintenance of affordable housing should be sought from developers. Repairs should be funded from rents (see last bullet point in Policy 19).</p>	
7520	<p>King Sturge Blofield already benefits from a number of facilities which could support additional housing. For example, a village hall, primary school, convenience store, local GP surgery and good bus links all service the area. The wider infrastructure requirements already set out in the document such as the North Norwich Distributor Route would further enhance the accessibility of the settlement. Similarly, improvements to the A47 between Blofield and Acle will significantly improve transport links. Therefore, sufficient infrastructure either exists, or is planned, to accommodate additional new housing development both up to the level allocated (50 dwellings) and beyond (100-200 dwellings).</p>	
7568	<p>Norfolk Constabulary Housing at service centres (identified as Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/ Chedgrave, Long Stratton, Poringland/ Framingham Earl, Reepham and Wroxham).</p> <p>Lower level development in the above service centres are covered by adequate Police Stations or service partner sites, such as the Loddon Safer Neighbourhood Team being based at Hobart High School.</p> <p>Investment in Police Services in these areas would be directed to enhancing and improving existing infrastructure.</p>	
7605	<p>Thurton Parish Council Key service centre Loddon. Refer to our responses Q2 bus service, also Q8 and Q13. Infrastructure improvements needed i.e. roundabout at A47/ A146 junction and Park & Ride at Trowse (before the Trowse by-pass)</p>	



7611	Trafford Trust Estates (6. THE ROLE OF KEY SERVICE CENTRES 6.1. Whilst Policy SS2 of the East of England Plan seeks to locate the majority of new development in and adjacent to the Key Centres for Development and Change identified in Policy SS3, Policy SS4 of the EEP recognises the role of market towns and larger villages in providing employment and services to their rural hinterlands and meeting housing needs. Policy SS4 of the EEP requires LDDs to define the approach to development in towns other than those listed in Policy SS3 and in the rural areas. 6.2. Given that Policy SS4 of the EEP requires LDDs to consider the potential of key service centres to accommodate development which is sympathetic to the local character and of an appropriate scale/nature in relation to local housing and employment needs, our clients welcome the identification in Policies 7 and 8 of the Technical Consultation of the role to be played in Broadland, Norwich and South Norfolk by the Key Service Centres and the Service Villages. This approach reflects the advice in the East of England Plan that market towns and key rural settlements should also accommodate growth, at a level commensurate with their size and role. Wroxham 6.3. We endorse the comments at paragraph 7.16 of the Technical Consultation regarding the Key Service Centres defined at Policy 7 where at least "a small amount of growth can be expected." The settlements defined as Key Service Centres at Policy 7 of the Technical Consultation have a range of facilities enabling them to meet local needs as well as the requirements of residents of surrounding areas. In that context, our clients acknowledge the description of Wroxham to be found at paragraph 7.26 of the Technical Consultation and the proposition in Policy 7 that Wroxham has the capacity to accommodate 100 to 200 dwellings by 2026. 6.4. The Trustees support the identification of Wroxham as a Key Service Centre in Policy 7 of the Technical Consultation and the proposition that the settlement has the capacity to accommodate some 200 dwellings. As indicated at paragraph 7.26, Wroxham is a gateway to the Broads and, given its links to Hoveton as a local employment, service and major tourism centre, could support the development of further housing. Paragraph 7.26 notes that such a degree of change "is well within utilities capacity limitations" and "development must provide improved community facilities." 6.5. Paragraph 76.1 of the Broadland District Local Plan (Replacement) 2006 notes that Wroxham "is a large village which has developed around the crossing of the River Bure. In the north, east and west the low-lying areas of the river valley have restricted the spread of the village, giving its present compact form, and providing its attractive wooded setting." Development arising on the southern edge of Wroxham would not compromise the factors described at paragraph 76.1 of the Local Plan (Replacement). The area broadly enclosed between The Avenue, Charles	
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Close, Keys Drive and Broad Farm does not exhibit the characteristics described at paragraph 76.1 of the Local Plan (Replacement).

6.6. There is capacity on land at the southern approach to Wroxham to accommodate the amount of new housing described at Policy 7 of the Technical Consultation. The Trustees acknowledge that the land concerned is located within the Area of Landscape Value defined by virtue of Policy ENV8 of the Broadland District Local Plan (Replacement) 2006. However, carefully considered landscaping/siting of buildings will mitigate any impact upon the surrounding landscape arising as a result of new housing located at the southern approach to Wroxham.

6.7. Land around Wroxham is covered by Policies ENV1 and ENV8 of the Local Plan (Replacement) and, in our submission, the only area capable of accommodating the degree of change anticipated at paragraph 7.26 of the Technical Consultation can be found in sites BDC0158 and BDC0159 described in the present Strategic Housing Land Availability Assessment Consultation. A limited amount of new housing could be accommodated in the northern segment of site BDC0160 and the Trustees would be prepared to assist Broadland District Council in discussions regarding the relocation of Wroxham Football Club.

6.8. Paragraph 6 of PPS7 contends that people who live in rural areas should have reasonable access to a range of services and facilities. Local planning authorities are expected to facilitate and plan for accessible new services/facilities, particularly where such an approach delivers mixed and multi-purpose uses that maintain community vitality. The Trustees believe that a package of proposals, utilising land at the southern approach to Wroxham, would respond directly to that advice and the expectation established at paragraph 7.26 of the Technical Consultation with regard to the accommodation of new housing at Wroxham.

6.9. A planned extension at the southern edge of Wroxham would utilise land that is influenced by the urbanised nature of the built-up area of the settlement and the transportation corridors of the A1151 and the B1140. The land required to accommodate the anticipated level of new housing does not exhibit a landscape/visual relationship with The Broads. There is a discernible difference in character and landscape quality and a southern extension of the settlement would not conflict with Policy 11 of the Technical Consultation. New housing on the southern approach to Wroxham will not have a direct or harmful visual impact upon The Broads.

7. SERVICE VILLAGES

Rackheath

7.1. The Trustees welcome the acknowledgement within the Technical Consultation of the role that can be played by the Service Villages. The Joint Core Strategy for Broadland, Norwich and South Norfolk must provide a sound policy framework not only for the built-up area of Norwich but also the extensive rural hinterland around the city. In that general context, it is important for the JCS to recognise the function that Service Villages and Key Service Centres fulfil in the working of the wider Norwich area.



7.2. Rackheath, given the location of Salhouse Station and the industrial estate off Wendover Road, can play a more substantial role than would be expected in the light of the wording of Policy 8 of the Technical Consultation. Paragraph 57.11 of the Broadland District Local Plan (Replacement) 2006 notes that the employment area at Wendover Road is protected as a strategic employment area. The importance of significant employment areas to the delivery of a sound spatial strategy is generally recognised at Policies 2 and 15 of the Technical Consultation. Whilst we acknowledge that the industrial area at Rackheath is smaller than, for example, the Broadland Business Park, it represents an important component of the wider infrastructure available to underpin sustainable growth in the area to be covered by the JCS. Furthermore, accessibility to Rackheath and the industrial area will be enhanced by virtue of the construction of the proposed Norwich Northern Distributor Road.

7.3. Policy 2 of the Technical Consultation refers to the strategy for accommodating growth in the Norwich Policy Area and the role to be played in the delivery of the anticipated policy framework by employment development at strategic locations and the provision of enhanced transport infrastructure, including the Norwich Northern Distributor Road and a new rail halt at Rackheath. Policy 2 further states that innovative new rail services "will be investigated on the Wymondham-Norwich-Wroxham axis." The combination of these locational factors suggests, in the particular case of Rackheath, that the settlement should be expected to accommodate more than 10-20 new dwellings as well as small scale employment or service development. Rackheath is capable, given its context, of accommodating more growth than is anticipated in Policy 8 and such an outcome would be appropriate to the needs of the village and its immediate surroundings.

7.4. We acknowledge the observations at paragraph 7.28 and 7.29 of the Technical Consultation to the effect that the Service Villages will provide for limited housing growth and accommodate small scale local employment opportunities to provide for the diversification of the local economy. However, given the particular locational characteristics of Rackheath, we would suggest that the settlement be viewed more critically as a sustainable location for enhanced housing and employment growth. The industrial area off Wendover Road/Green Lane West should be the focus for a limited expansion of the settlement, towards Wroxham Road.

7.5. Whilst The Trustees acknowledge the intent of the Technical Consultation to recognise the role that Rackheath could play as a Service Village, they object to the proposition in Policy 8 that the limited growth of the settlement should be restricted to a level of 10-20 new dwellings and small scale employment. Such an outcome would fail to take advantage of the particular locational advantages of Rackheath and its relationship to the alignment of the proposed Norwich Northern Distributor Road and the presence of the railway station at Salhouse.

7.6. The Trustees are aware that the Greater Norwich Development Partnership has suggested that Rackheath could be an appropriate location for an eco-town. We have noted that the Leader of Broadland District Council has stated that the north east sector of Norwich "is an area which has been identified as an area for planned and managed



growth and Rackheath is a part of this." The Trustees would note that Rackheath may be considered by the GNDP to represent an appropriate location to accommodate a significant growth node.

7.7. We would suggest that expansion in the general area of Wroxham Road/ Green Lane West/ Wendover Road should form part of the spatial strategy for the Norwich Policy Area either in its own right or part of a much wider development area that may be promoted, in due course, through the Joint Core Strategy. We would suggest that the GNDP's comments regarding a potential eco-town at Rackheath support our general proposition that the settlement occupies a strategic location, well related to the railway line at Salhouse and the proposed alignment of the Norwich Northern Distributor Road, enabling it to accommodate a greater degree of growth than is anticipated at Policy 8 of the Technical Consultation.

Spixworth

7.8. As with Rackheath, the Trustees support the recognition given to Spixworth in Policy 8 as a settlement capable of accommodating further growth. The wider growth agenda for the Norwich area can be drawn upon in a positive manner to secure a modest edge-of-village development at Spixworth which could contribute to the provision of the local community facilities sought by virtue of Policy SPI1 of the Broadland District Local Plan (Replacement) 2006.

7.9. Paragraph 64.7 of the Broadland District Local Plan (Replacement) 2006 states that a designated shopping area has been defined at Spixworth in accordance with Policy SHO3 of the Local Plan. The designated shopping area comprises a group of shops east of Rosetta Road and the Co-op store nearby on the northern side of Crostwick Lane. The Local Plan notes that, although not centrally located, this is the only significant group of shops in the village "and it is important that it continues to serve as a local centre." Given the content of paragraph 64.7 and Policy SPI1 of the Local Plan (Replacement), the Trustees would propose that a limited extension of Spixworth, greater than the degree of change anticipated in Policy 8 of the Technical Consultation, would be appropriate to ensure the provision of necessary community facilities and providing continuing support to the local group of shops. If new recreational facilities are to be provided at Spixworth, a degree of enabling residential development will be required to assist implementation.

7.10. The Trustees do not consider that the allocations for recreational facilities established at Policy SP11 of the Local Plan (Replacement) are deliverable, given the funding that would be required to provide them. We would note that the same site was the subject of an identical policy provision in the previous Local Plan. This emphasises the point that, given the passage of time since the land off Crostwick Lane was considered for this use, there have been difficulties in delivering the proposed pitches and courts. Policy 18 of the Technical Consultation requires all development to maintain or enhance the quality of life and well-being of communities. The emerging Joint Core Strategy stresses the importance of a green infrastructure strategy and the need to ensure that, in order to deliver thriving communities, infrastructure requirements will be addressed in a holistic way.



7.11. Paragraph 64.10 of the Broadland District Local Plan (Replacement) notes that Spixworth is deficient in open space. The Joint Core Strategy should provide a flexible planning framework which will enable more detailed proposals to come forward which will implement the Council's open space requirements, both in the context of the existing population and an enlarged household base which will arise as a result of the implementation of Policy 8 of the Technical Consultation.

7.12. We have noted that paragraph 64.10 of the Local Plan (Replacement) states that "although the Crostwick Lane site and the proposed extension to the existing recreation ground are in the neighbouring parish of Crostwick both relate well to the developed area of Spixworth. The sites will also provide for the formal recreational needs of people living in Crostwick." We endorse that assessment and believe that the area that the Trustees propose for new housing development at the eastern edge of the village is physically and functionally part of Spixworth. The areas of land relate well to the developed/built-up area of Spixworth. An appropriate mixed use extension of the village can be achieved in order to provide enhanced community facilities. The construction of a limited expansion at the eastern edge of Spixworth would help to fund the provision of new playing fields, tennis courts, a bowling green and, if necessary, a new village hall, thereby greatly enhancing the facilities available to the local community.

7.13. The broad approach to an extension at the edge of Spixworth promoted by the Trustees will not compromise important environmental considerations/policies. The land concerned, being enclosed between the built-up area of Spixworth and the B1150, is not affected by the constraints imposed by Policies ENV1 and ENV8 of the Local Plan (Replacement). A comprehensive and co-ordinated approach to a limited expansion of the village will provide a logical and visually acceptable extension to Spixworth. It would provide much needed facilities of benefit to the local community, together with a reasonable proportion of affordable housing.

7.14. Paragraph 64.13 of the Local Plan (Replacement) notes that although Crostwick Lane "is relatively busy, it has been subject to extensive traffic calming measures and for this reason it is anticipated that the site on the north side can share the parking and changing facilities on the south side of Crostwick Lane (suitably enhanced if necessary) without undue difficulty, although a separate access to serve maintenance and emergency vehicles, at least, will be required. In the longer term it may be desirable for more extensive recreation facilities to be located on this site." The Trustees acknowledge the comments regarding the potential longer term locational perspective and would suggest that a comprehensive and co-ordinated package of measures at the eastern edge of Spixworth would achieve the appropriate objectives. However, that position could not be achieved if Policy 8 of the Technical Consultation is used in an inflexible manner, restricting the required enabling development to a maximum of 20 dwellings.

8. HOUSING

8.1. We endorse the observation at paragraph 8.4 of the Technical



	<p>Consultation that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 25,420 dwellings in Broadland, Norwich and South Norfolk in the period to 2026.</p> <p>8.2. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.</p> <p>8.3. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change and the wider Broadland/Norwich/South Norfolk area.</p>	
7634	CGMS Ltd <p>Policy 7 Key Service Centres - further consideration should be given to the role (and scale of future development) at Wroxham/Hoveton (Question 23). While appreciating the constraints associated with the Broads - and the approach set out in Policy 11 - there would be advantages in strengthening Wroxham, as this could provide the northern anchor for the north east - south west transport corridor and would particularly assist with the economics of rail services on this corridor. Improvement to such services (also highlighted in Policy 2) would also facilitate recreation and tourism visits to the Broads in a sustainable manner.</p> <p>Policy 8 Service Villages - this policy identifies both Salhouse and Rackheath as service villages. While the policy may be appropriate for the former, the integration of Rackheath within the proposed settlement (Policy 5) would be at variance with Policy 8 and we would suggest that it is therefore excluded from the list of service villages.</p>	



	<p>Policy 12 The hierarchy of centres - we support this policy, in particular its proposal that new district centres/ high streets be established at the proposed major growth locations within the Norwich Policy Area. We note that neither the policy nor supporting text seek to define the content of such centres. This approach allows for a welcome degree of flexibility which will ensure that the centres can deliver what range of facilities the new communities determine that they need.</p>	
7641	<p>Bidwells Gladedale (Anglia) Ltd believes that to deliver a minimum of 200 new dwellings in Hethersett, there would be no significant infrastructure improvements needed. As an example, Gladedale's site, land north of Great Melton Road, could accommodate approximately 180 dwellings. There is predicted to be sufficient spare capacity in Hethersett's nursery and high schools to accommodate expected numbers of children from such a development, and Hethersett Junior School would only be above capacity by a relatively small number of pupils (circa 13).</p> <p>Initial infrastructure capacity assessments have been undertaken, and there is believed to be adequate capacity in Hethersett's existing electricity, gas and water supply networks to adequately service growth of 200 dwellings. Foul drainage/waste water treatment capacity in Hethersett is also likely to be sufficient for the delivery of 200 dwellings, although Anglian Water has advised that some local improvements to the foul sewers in the vicinity of Gladedale (Anglia) Ltd's site would be needed.</p> <p>Consultation was undertaken with the Primary Care Trust during the early stages of the preparation of the South Norfolk LDF and the PCT indicated that a Group Practice covers Hethersett, Cringleford and Mulbarton, with three premises. At the time of the consultation, the PCT indicated that expected expansion of the Cringleford surgery would release sufficient capacity to allow a development of 180 dwellings in Hethersett. They confirmed that, subject to satisfactory progression of the Cringleford expansion plans, they did not foresee any obstacle to meeting the healthcare needs of the proposed development.</p> <p>A Transport Assessment of Gladedale (Anglia) Ltd's site (carried out in 2006) concluded that Hethersett had excellent public transport connections to and from Norwich and that additional traffic generated by a development of c.180 dwellings could "easily be accommodated on the local road network in terms of traffic capacity". A copy of the TA has previously been submitted to South Norfolk Council.</p>	
7658	<p>Highways Agency</p> <p>Policy 7 - Key Service Centres The Plan proposes ten key service areas which plan to promote local employment opportunities, reducing the need to travel, thereby lessening the impact on the Trunk Road network. As mentioned under Policy 6, the Highways Agency is concerned regarding any development at Acle.</p>	



7671	<p>Mr Robert Debbage</p> <p>Policy 8 and paragraphs 7.27-7.29 define and list the Service Villages in Broadland and South Norfolk. It is suggested that the most essential services to support small scale growth are: a village hall, journey to work bus service (to Norwich), primary school and food shop. However, Alpington/Yelverton is classed as an Other Village under Policy 9, with Other Villages deemed suitable only for infill or small groups of dwellings and small scale business or services.</p> <p>Mr Debbage is of the opinion that the Other Village of Alpington/ Yelverton should be broadened to include Bergh Apton (which is located very close to Alpington) and the 'combined' settlement should then be upgraded to a Service Village. As a long-term resident and landowner in the area, Mr Debbage believes that the three villages effectively act as a service village, jointly providing a level of services which the villages do not provide individually. To clarify, there are village halls in Alpington and Bergh Apton, Norwich journey to work bus trips from Alpington and Yelverton, Alpington & Bergh Apton primary school and a food shop/post office in Bergh Apton.</p> <p>Mr Debbage contends that there are suitable housing sites in Alpington/Yelverton/Bergh Apton to easily be able to accommodate a minimum of 10-20 new dwellings, to help meet the needs of the villages and their immediate surroundings. Including Bergh Apton in an expanded Alpington/Yelverton/Bergh Apton Service Village will also help to secure the protection of Bergh Apton's food shop through the wording in Policy 8.</p>	
7714	<p>Bidwells Long Stratton has sufficient school, utility and service infrastructure capacity to accommodate at least a further 100 to 200 new homes. The throttle limiting growth on the western side of the village is the capacity of the A140/Flowerpot Lane & Swan Lane junctions. We can now demonstrate that the capacity of these junctions can be increased to accommodate at least a further 100 to 150 homes to the west of Long Stratton (please see answer to question 24).</p> <p>Long Stratton, which it has been agreed in previous adopted plans and at earlier Local Plan inquiries in spatial planning terms includes the Sunguard Homes site off Chequers Road, Tharston. The village has for many years been trying to get a bypass to relieve the congestion and vehicular access problems currently caused by the routing of the A140 road through the village. These problems were partially relieved by the installation of traffic lights at the A140/ Flowerpot Lane Junction in 2001, which were required to facilitate the development of the previous phase of the Sunguard land for housing. The installation of these lights, which were paid for by Sunguard, greatly improved vehicular access to the A140 from the western side of the village. It has been agreed with the County Council, following studies undertaken by Sunguard, that there is still capacity for approximately 30 dwellings to be constructed at Chequers Road in addition to the existing development. This figure is in accordance with the growth constraint level of 20-50 dwellings for Long Stratton as referred to in paragraph 7.23 of the Technical Consultation document.</p>	



	This capacity constraint would however limit the potential development of the remaining Sunguard land and would therefore need to be raised to accommodate its full development potential.	
7740	Kimberley & Carleton Forehoe Parish Council All areas would require significant infrastructure development under these proposals. To plan efficiently Long Stratton should be the major growth area.	
7802	Long Stratton Parish Council For any of the options, more employment at Long Stratton is required, and of course in respect of options 2 and 3 a lot more. Upgrading/renewal of sewerage and foul water systems.!!	
7830	NHS Norfolk Some primary care developments are already under consideration in some of these key service centres. We will take account of planned growth in designing the developments in these towns and so there are unlikely to be significant infrastructure requirements in the future.	



KEY SERVICE CENTRES -Q23 What opportunities can growth bring?		
	There were 25 responses to this question.	
	Issues mentioned include support for existing businesses and services, more employment, policing, the categorisation of Ditchingham, provision of infrastructure, relocation of Wroxham Football Club and trade for local businesses / benefits for local economies. Communities mentioned include Aylsham, Diss Harleston, Wymondham, Norwich, Watton, East Dereham, Hingham, Ditchingham, Wroxham, Hoveton, Brundall. Loddon, Hethersett, Blofield, Hethersett and Long Stratton	
6825	Acle Parish Council Growth will support existing businesses and services.	
6861	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6868/9	Hingham Parish Council On the plus side another 100 properties could mean more employment and perhaps the expansion of the industrial estate. It could also mean more customers for the existing businesses in the town.	
7071	Norfolk Constabulary The proposed levels of growth at Aylsham, Diss and Harleston are catered for by good Police Station facilities. However, additional resource may be required to support front line policing. Higher levels of growth proposed for Wymondham will have an impact on Police resources. Additional resources will be required for the Safer Neighbourhood Team.	
7075	Mr J Peacock The village of Ditchingham contains a range of facilities and services and we take the view that it should be categorised as a "Key Service Centre" and not a "Service Village" as proposed in the Technical Consultation Document, August 2008. Ditchingham contains a population of nearly 1,700 residents and is strategically well located within the district being approximately 2 miles north of Bungay and positioned on the Norfolk/Suffolk border. Whilst the village may not contain all of the facilities set out within paragraph 7J6 of the document, this list of facilities in our view is not a good indicator of sustainability. Of principal importance is the strategic position of the village within the District and the wider hinterland and the accessibility of the village to key services by public transport. All of the facilities outlined in paragraph 7.16 can be accessed from Ditchingham and Broome via public transport.	
7101	Persimmon Homes These sites are located within the broad area for a potential urban extension to the North East of Norwich. We support this as a location for a major sustainable urban extension to contribute toward meeting housing needs in the over the plan period and beyond. Major development at this location will enable the planning and delivery on a comprehensive basis of the infrastructure needed to support growth.	



<p>7165</p>	<p>Bidwells Mr A Semmence supports the identification of Hingham as a Key Service Centre in the settlement hierarchy. Hingham, as a market town has a good range of facilities and services including a primary school, post office, a variety of shops, village hall with playing fields, Church's, medical surgery, dentist, library, and employment area.</p> <p>The local highway network and public transport bus services also provides Hingham with direct access to other employment opportunities and a wider range of facilities available in Wymondham, Norwich, Watton and East Dereham.</p> <p>In this context Mr A Semmence considers it right and proper that Hingham is allowed to grow to meet both the housing and employment needs of not only the Town but also its rural hinterland. In this way it will not only further support existing services and facilities but also have the potential to attract additional ones.</p> <p>Notwithstanding this broad support Mr A Semmence contends that the emerging policy approach to limit growth within Hingham to 100 dwellings is too restrictive given the significant period involved (2006-2026), restricting the ongoing housing needs of local people. It is held that the figure of 100 dwellings, in the context of Hingham today which has a population of 2078 in 944 households (2001 census) should therefore be increased.</p> <p>Mr A Semmence suggests that in accordance with the East of England Plan (Regional Spatial Strategy), that growth targets for the Key Service Centres should not be expressed as ceilings to development, rather that they are minimum targets to be achieved and go beyond in appropriate circumstances, such as to achieve sustainability objectives and to deliver mixed and balanced communities.</p>	
<p>7168</p>	<p>Bidwells Gladedale considers there is merit in revisiting the possibility of the relocation of the Wroxham Football Club, which could be brought forward in tandem with the proposed residential development. We are mindful that this relocation has been considered at some length during the course of the previous Broadland Local Plan Deposit Draft and an earlier Inquiry in 1999. There was a strong case put forward at the time which demonstrated the need for the club to move. It is considered that the relocation could bring significant wider community benefits.</p>	
<p>7179</p>	<p>Hopkins Homes Ltd The role that the existing market towns of Harleston and Diss, together with many of the larger settlements within the wider rural surroundings can play by accommodating a significant proportion of this growth should therefore not be underestimated.</p> <p>It is pleasing to note that via Policies 6 to 8 of the current Technical Consultation document, there appears to be some acknowledgement of this fact, with a slight increase in the numbers of new dwellings now proposed for the market towns and larger villages put forward by the Partnership compared to the stance suggested within the previous 'Issues & Options' Consultation. However, in view of the aforementioned circumstances, Hopkins Homes is of the view that additional scope exists to further increase the proportion of new dwellings to be developed within these settlements</p>	



7220	<p>Salhouse Parish Council Wroxham/ Hoveton - increased trade for local businesses Others - no comment</p>	
7259	<p>Persimmon Homes Re: GNDP CONSULTATION - LAND OFF CUCUMBER ROAD, BRUNDALL These representations have been made in relation to the above site in response to the technical consultation exercise on the Joint Core Strategy for BroadLand, Norwich and South Norfolk.</p> <p>Policy 7 of the GNDP technical consultation document identifies Brundall as a key service centre with a limited range of dispersed shops and services and a major centre for boatyards.</p> <p>Under Policy 15 the document states the Local economy will be developed in a sustainable way to facilitate the job growth potential of the local economy and deliver the RSS target of 35,000 additional jobs between 2001-2021. In addition Policy 15 goes on to state that sufficient employment land Will, be allocated to meet identified need and to provide for choice, in particular the need of small and start up businesses will be addressed through the allocation of new small scale employment sites. Additional Large scale needs will also addressed by way of sufficient allocations to provide a choice of range of sites.</p> <p>We are in support of Brundall being identified as a key service centre and the general statements made in Policy 15 as above. Brundall with its current Lack of opportunities coincided with its location close to Norwich and good transport links is well suited to provide employment/ commercial opportunities and help meet the targets set out within Policy 15. In Light of this we feel that the identified site, please see map attached, is the ideal Location for any such employment and commercial allocation.</p> <p>In summary a real opportunity exists to enhance Brundall and the surrounding area and we strongly feel that the identified site can deliver the needs of Brundall under the policies set out in the document. We can confirm on behalf of the landowner that there is a willingness to work together with the District Council to provide such an opportunity.</p>	
7263	<p>Barton Willmore 1.11 In terms of location the proposed development site (Appendix 1) is bounded to the east by the A146 Norwich Road and to the south by George Lane, Loddon. The A146 provides a direct link to Norwich City Centre and the existing public transport service serving the site and the surrounding area is good. To the west and south of the site is medium density residential development. Immediately opposite the site to the south is Loddon Middle School; to the south west of the site are playing fields. To the north and east is open countryside. Hobart High Secondary School is located within easy walking distance of the site and so is the nursery/infant school. Loddon Middle School is directly opposite the site.</p> <p>1.12 The site currently comprises an open, square field. It is envisaged that access would be gained from a proposed roundabout off of George Lane. The site is located within a very sustainable location in very close</p>	



	<p>proximity to a range of facilities. The centre of Loddon, which contains a number of small shops and facilities, is approximately 11 miles from Norwich City by car or bus. Regular bus services operate from Loddon to Norwich. The nearest train station is Cantley, approximately 3.47 miles away. Norwich Coach Station is approximately 10 miles away and Norwich International Airport is 12.98 miles away.</p> <p>1.13 The description of the site provided in paragraphs 1.11 - 1.12 above demonstrates that the location of the site is such that development of it would form a natural extension to the existing residential areas adjoining the site. Allocation of the site would present a strong opportunity for new development of high quality design in keeping with the rural character of the locality. Clearly deeper analysis of the site and further masterplanning of the site would be required however at this stage we envisage that a landscape buffer of approximately 40m along the southern boundary would be provided in order to retain the rural appearance of the locality.</p> <p>1.14 Phillip Jeans Homes would emphasise that development of the George Lane site would make a significant contribution to sustaining the village of Loddon in the longer term. The Inspector for the Local Plan Inquiry noted that the village "...supports a wide range of services and community facilities including a variety of shops, public houses, filling station, library, medical facilities and a small business centre. It is also well located with regard to the wider area via the A146 Norwich/Beccles Road which, while not a 'strategic route' in the context of Structure Plan 1993 policy H.2m is an established public transport corridor. Policy H.3 identifies Loddon/Chedgrave as one of the towns outside the Norwich Policy Area and away from 'strategic routes' where housing provision will be made subject to employment, environment and infrastructure provision.'7 Phillip Jeans Homes' view is such that without comprehensive redevelopment of the site at George Lane, the vitality of the village is unlikely to be sustained in the longer term - for example, the schools will need pupils to continue operating which in turn requires the presence of a younger population.</p> <p>1.15 Paragraph 7.22 of the Technical Consultation document provides some background information with regard to Loddon and notes that "New development of 100 - 200 dwellings is proposed to 2026, subject to the overcoming of the shortfall in capacity at the high school, although environmental constraints and areas at risk of flood will be significant factors at the site specific stage." Phillip Jeans Homes would reiterate that they would expect to make appropriate contributions to essential and local supporting infrastructure such as education through negotiations with the local planning authority at the planning application stage. In terms of environmental constraints no insurmountable problems are apparent and it is considered that the site could be delivered in a sustainable and timely manner</p>	
7272	<p>Bidwells As outlined above, Gladedale (Anglia) Ltd asserts that Hethersett should be chosen as a major growth location. However, if it is indeed chosen, the first phase of housing would probably take until 2011/2012 to deliver (assuming a planning application is granted consent in 2010/2011). The Gladedale site referred to above could potentially start delivering houses during 2010 (assuming approval is granted during 2009), thus contributing to early delivery of housing in the GNPD area and</p>	



	<p>contributing to the achievement of a 5-year supply of dwellings. It would be easy to design the site to 'fit into' the masterplan currently being prepared for the major growth area in Hethersett so that the two would merge seamlessly together.</p> <p>As stated in the response to questions 3-12, Hethersett benefits from its location close to Norwich, its proximity to major employment sites (such as the hospital, UEA, Norwich Research Park, Wymondham and Longwater employment areas) and excellent public transport links to Norwich, Wymondham and Cambridge.</p>	
7307	Michael Haslam Associates Ltd. New housing will bring increased spending in local shops and the employment area will provide local jobs and reduce the need for local people to travel away from the village for work.	
7383	I E Homes and Property Jobs	
7447	Environment Agency (Eastern Area Office) See answer to Question 5	
7477	Hethersett Parish Council - Access to additional facilities but by managed development	
7507	<p>Carter Jonas Housing allocations in the appropriate key service centres will contribute to the housing requirements for the settlements, including affordable housing. It will maintain viability of shops and services and generate sustained use of community facilities and the public transport system. Where there is an identified gap in infrastructure eg, open space provision, development may be an opportunity to address this either with provision on site or through S106 contributions.</p> <p>Development of sites at key centres such as Blofield which included employment would have significant benefits not only for the local community but also to strengthen the employment base for the area. The Greater Norwich Employment Growth and Sites & Premises Study identified a gap in supply for small and start up businesses. It specifically recommended that part of this demand needed to be addressed by development on rural sites. A mixed use housing/employment development at Blofield on a site such as that identified on the attached plan would be directly meeting that demand.</p> <p>From a commercial viewpoint proximity to Norwich would be a significant attraction to potential commercial occupiers, as would instant access to the A47.</p> <p>None of the key centres will be able to provide employment for all residents although this can be improved as suggested above. Nor is it realistic to think that even with such opportunities residents will not work elsewhere. It is therefore sensible to consider proximity to Norwich, the largest settlement in the district, as a benefit in terms of access to jobs.</p> <p>Blofield is situated on the A47, 8 miles from Norwich and 3 miles from the Broadland Business Park which is proposed for expansion. The bus services from Blofield mean the City centre is less than 25 minutes away (and the Business Park less than 15 minutes) making it a highly sustainable location for new housing.</p>	



7521	<p>King Sturge Blofield was not subject to a housing allocation in the Replacement Local Plan, or the previous Broadland Plan. There is a danger that without additional housing in the settlement, the village will stagnate and decline. A slight increase in Blofield's housing would help ensure its vitality and viability.</p> <p>New homes will help retain the indigenous population, which is necessary to support existing services and facilities, deliver much needed affordable housing and encourage further investment in Blofield. However, Blofield should be allocated 100-200 dwellings in line with other Key Service Centres.</p>	
7635	<p>CGMS Ltd Accepting environmental constraints, further consideration should be given to the scale of future development at Wroxham/ Hoveton as this could provide a northern anchor for the north east - south west corridor and assist with the economics of rail services on this corridor</p>	
7642	<p>Bidwells As outlined above, Gladedale (Anglia) Ltd asserts that Hethersett should be chosen as a major growth location. However, if it is indeed chosen, the first phase of housing would probably take until 2011/2012 to deliver (assuming a planning application is granted consent in 2010/2011). The Gladedale site referred to above could potentially start delivering houses during 2010 (assuming approval is granted during 2009), thus contributing to early delivery of housing in the GNPD area and contributing to the achievement of a 5-year supply of dwellings. It would be easy to design the site to 'fit into the masterplan currently being prepared for the major growth area in Hethersett so that the two would merge seamlessly together.</p> <p>As stated in the response to questions 3-12, Hethersett benefits from its location close to Norwich, its proximity to major employment sites (such as the hospital, UEA, Norwich Research Park, Wymondham and Longwater employment areas) and excellent public transport links to Norwich, Wymondham and Cambridge.</p>	
7715	<p>Bidwells The provision of new homes will contribute to meeting the accepted housing needs in the Long Stratton area. The Sunguard land is approximately 4ha in extent and could accommodate approximately 120 to 150 dwellings at normal density levels for this type of site. The site is readily serviced being a continuation of previous phases of housing development, owned by a housebuilder, and consequently immediately available for development. The land is also well located to Long Stratton facilities being within walking distance of the first, middle and high schools, the health centre, the leisure centre, local shops, bus routes, playing fields, and the substantial employment centres of South Norfolk Council and the Tharston employment estate. This pedestrian access to and from the site is facilitated by an existing network of good metalled and lit footpaths/cycleways, which were constructed in connection with previous phases of the Sunguard development, and mean that reliance on the private car for access to local facilities for the majority of people residing at Chequers Road is unnecessary.</p>	



7741	Kimberley & Carleton Forehoe Parish Council Long Stratton could become a strong vibrant community south of Norwich providing excellent links to the South with housing which people could afford and an existing rail network to Norwich and the South.	
7803	Long Stratton Parish Council Growth opportunity could bring opportunities for businesses to expand /come in.	



KEY SERVICE CENTRES - Q24 What are the constraints to delivering the proposed level of growth and how can these be overcome?		
	There were 25 responses to this question.	
	Issues mentioned include lack/ delay of infrastructure, developer contributions and development at Poringland and Framingham Earl, visitor pressure and water abstraction effects at SSSIs and reserves, archaeological sites, traffic pressures, non-delivery of facilities, tight settlement boundaries around Blofield, biodiversity, exception policies and 'community feel'. Communities mentioned include Hingham, Poringland, Framingham Earl, Acle, Brundall, Loddon, Chedgrave, Reepham. Wroxham. Hoveton, Hethersett Aylesham, Blofield and Long Stratton.	
6826	Acle Parish Council Constraints - lack of infrastructure, as question 22.	
6862	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
6870	Hingham Parish Council Hingham is a small town of Georgian houses in the conservation area with narrow roads leading off from the centre. Parking is a big problem with nobody wanting to walk from a car park to the shops. The greens are registered village greens and a valuable amenity area which needs to be preserved. This being the case there are very few legal parking spaces within the town for visitors and very few options for creating much needed parking spaces. Growth is to be applauded but thought should be given to the problems it creates, before it happens	
6985/6/7	Diocese of Norwich The Diocese of Norwich consider that it is appropriate to propose 100 dwellings at Hingham, as specified within Policy 7 'Key Service Centres'. However, it is considered that the 100 dwellings proposed at Hingham should be viewed as a minimum. The constraints to growth at Hingham are not insurmountable and the opportunity to provide further housing development at the village should not be dismissed, if constraints to growth in excess of 100 dwellings can be overcome. For example, high school capacity limitations could be addressed through appropriate developer contributions. In terms of local shops and facilities, new residential development could also comprise new local shops and services to further underpin the sustainability of Hingham as a location for further growth, The Diocese of Norwich object to the presumption that no further allocations will take place at Poringland / Framingham Earl. Paragraph 7.24 of the consultation document confirms that a number of housing commitments have not been built and that on this basis, no new allocations will be proposed. The Diocese of Norwich would question why development of these sites has not been forthcoming and whether there is a need to revise allocations at Poringland / Framingham Earl. Furthermore, the existence of allocations, either being built out or not, should not be reason in itself to resist further allocations. Additional housing allocations could further support existing and new job opportunities and also bring about improved provision of local shops and services. Consideration should therefore be	



	<p>given to whether allocations at Poringland / Framingham Earl should be reviewed and that in addition to existing allocations or a like for like replacement of existing allocations, The Diocese of Norwich consider that it would be appropriate to allocate land for a further 100 dwellings in continuing to maintain the viability of Poringland / Framingham Earl as a Key Service Centre</p>	
7013	<p>Natural England See above. The key service centres offer some additional constraints in relation to proximate designated sites, as follows:</p> <p>Acle - Damgate Marshes, Acle SSSI; Decoy Carr, Acle SSSI; Halvergate Marshes SSSI; Burgh Common & Muckfleet Marshes SSSI; Upton Broad & Marshes SSSI - all of these are component sites of the Broads SAC, Broadland (Special Protection Area) SPA and Ramsar</p> <p>Brundall - n.b. very close proximity to Yare Broads & Marshes SSSI (component site of the Broads SAC, Broadland SPA and Ramsar)</p> <p>Hingham - n.b. very close proximity to Sea Mere, Hingham SSSI</p> <p>Loddon/Chedgrave - Hardley Flood SSSI; Poplar Farm Meadows, Langley SSSI and Ducan's March, Claxton SSSI (component sites of the Broads SAC, Broadland SPA and Ramsar)</p> <p>Reepham - Booton Common SSSI; Whitwell Common SSSI and Foxley Wood SSSI and NNR</p> <p>Wroxham - n.b. very close proximity to Bure Broads & Marshes SSSI (component site of the Broads SAC, Broadland SPA and Ramsar)</p> <p>The constraints relate principally to increased visitor pressure and - for sites in the Broads - how increased water abstraction could impact on water levels, and increases in effluent could result in further declines in water quality. These latter issues to be addressed through water cycle studies and appropriate infrastructure. Visitor pressure could be partially alleviated through the provision of alternative recreational greenspace and on-site buffering and enhancement, supported by 'softer' techniques such as awareness-raising signage.</p>	
7097	<p>Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.</p>	
7102	<p>Persimmon Homes There are no designations within the area which prevent major development. There may be a number of sensitive parts within the broad area, but a comprehensive masterplanning and design solution will ensure these areas are not adversely affected by development.</p>	



7166	<p>Bidwells In conclusion, Mr A Semmence contends that given the level of services that it possesses Hingham should accommodate sufficient development to meet the needs of the community. As such it is suggested that as a Key Service Centre (Policy 7) Hingham should accommodate at least 100 new dwellings, as well as employment or service development appropriate to the needs of the Town and its immediate surroundings. Further growth will be accommodated where it can be demonstrated that it would contribute to meeting the needs and requirements of the Town and its surroundings and where sufficient capacity exists or can be provided to serve the growth and where it would not unduly impact upon existing environmental assets.</p>	
7169	<p>Bidwells Gladedale is a very active developer which is keen to deliver the growth on part of the land on this southern boundary of Wroxham. At this time there are no known constraints to the delivery of the growth, although further technical assessments are being undertaken regarding capacity of infrastructure, particularly regarding highways and access and landscape assessment.</p> <p>The subject land on the southern boundary of Wroxham should be given proper consideration through the Strategic Housing Land Availability, accordingly we are pleased to note that this area is included in the SHLAA, references BDC 158, 159 and 160. We would like to clarify that Gladedale (Anglia) Ltd maintain that it is suitable and deliverable for housing development.</p>	
7221	<p>Salhouse Parish Council Wroxham/ Hoveton - existing and potential traffic congestion; could be reduced by building a bypass, but at environmental cost.</p> <p>We do not have confidence in achieving good enough coordination between agencies to ensure infrastructure improvements will be made at the right time and in the right order.</p> <p>Others - no comment</p>	
7264	<p>Barton Willmore The proposed level of growth of circa 100 - 200 dwellings could be fully delivered on the Phillip Jeans Homes site. We do not envisage any insurmountable problems in terms of addressing known site constraints and would reiterate that development of the George Lane site is a wholly sustainable and logical option for development that would make a significant contribution to the continued vitality of the village.</p>	
7273	<p>Bidwells As described in the answer to question 22, Gladedale (Anglia) does not believe there are any significant constraints to delivering growth of a minimum of 200 dwellings in Hetherset. However, it is recognised that delivering major growth (4000 dwellings) in Hetherset would require a range of improvements in transport, utility supply, and social and economic infrastructure.</p> <p>I want to take this opportunity to reinforce the fact that Gladedale (Anglia) Ltd's site (Land North of Great Melton Road in Hetherset) is to be included in the preparation of the SHLAA. Gladedale (Anglia) Ltd has signed an option agreement with the landowner and both parties are fully committed to realising the residential development potential of this site as</p>	



	<p>soon as possible.</p> <p>Gladedale (Anglia) Ltd has already undertaken a considerable amount of technical work to underpin the release of the land. A considerable amount of information about the site has already been forwarded to South Norfolk Council as part of previous LDF consultation exercises; for instance, a letter was sent to South Norfolk Council on 22 November 2006 supplying additional technical information about the site (a Transport Assessment and a Landscape, Design & Access Statement). This site could therefore be brought forward swiftly for development, thus contributing to South Norfolk Council's 5-year supply of deliverable housing sites. The information contained in the SHLAA profile is correct except as follows:</p> <ul style="list-style-type: none"> • Assumed capacity: 180-200 dwellings; • Highway improvement: none needed other than pavement across the front of the site; • Access/safety: site can be accessed safely and adequately (please see the TA); • Public transport access: very good: a half-hourly bus service to Norwich and Wymondham throughout the day and the Thickthorn park-and-ride services (which operates every 10 minutes during the day). <p>Please accept this as Gladedale (Anglia) Ltd's formal submission to the Core Strategy and Strategic Housing Land Availability Assessment and please continue to keep me informed of progress.</p>	
7308	Michael Haslam Associates Ltd. There are no constraints to the implementation of the proposal which is on land under the control of a recognised and successful local developer.	
7384	I E Homes and Property See answer to question 22 and providing improvements where possible and or allocating more growth in better locations of both key service centres and service villages.	
7415	I E Homes and Property Jobs	
7448	<p>Environment Agency (Eastern Area Office) Reepham WWTW has been shown to have capacity for 325 further dwellings. However, stage 2a of the WCS has had to make assumptions regarding the capacity of the WTWW in the future. Whilst the planned growth is within the total capacity it reduces the headroom to around 100 dwellings. We would suggest caution in holding to the precise figures too closely to avoid targets being missed, either because improvement works prove too costly or discharge consents are restricted and growth cannot be achieved.</p> <p>Development of 100 - 200 dwellings is proposed in Acle. Stage 2a of the WCS indicates that there is existing headroom for 141 dwellings only. As discussed above we suggest that a precautionary approach is taken, especially as up to 60 more dwellings are being proposed than the existing WTWW can accommodate. Any development should be located outside flood zone 2 and 3 as shown on the Broadland District Council and Broads Authority SFRA.</p> <p>Wroxham is located within a large area of flood zone 2 and 3. Any potential growth should be planned outside of this area. Wroxham is also in an area of high groundwater vulnerability and within a Source</p>	



	Protection Zone. Whilst this does not prevent development it makes this location less favourable, in these terms, than some of the others under consideration.	
7478	Hethersett Parish Council No delivery of facilities identified in Q.22	
7508	<p>Carter Jonas Ensuring that the allocations are deliverable is a key criterion in assessing the location for development, particularly given the need to deliver to the RSS targets in this economic climate. It is understood that Broadland District Council are not confident they can currently meet their 5 year target.</p> <p>Based on the information within this Technical Consultation document, there does not appear to be any consistency in the location or size of the allocations given the constraints.</p> <p>One of the most significant constraints preventing delivery is infrastructure requirements both in terms of cost and delays. If an infrastructure element such as sewerage provision is at capacity then the cost of providing for additional capacity could very well outweigh the viability or benefits of development at the scale proposed in the Key Service Centres.</p> <p>The environmental constraints around the key service centres must not be underestimated. Where Greenfield development is inevitable it is crucial to protect the surrounding countryside from further encroachment. This is particularly so given the importance of maintaining the quality of the countryside surrounding the Broads in terms of tourism. The choice of location for the allocations should account for this.</p> <p>Acle, Brundall and Wroxham all have significant flooding constraints (evidence from Environment Agency website). Environmental designations under the existing Broadland Local Plan, South Norfolk Local Plan and Broads Authority Local Plan, show many areas around the key service centres are of high landscape value and worthy of environmental protection designations. Acle, Wroxham, Brundall and Reepham are all adjacent to such areas.</p> <p>The reason given for allocations at Reepham and Acle is that there can be no growth at Aylesham. This does not seem a sound argument for such growth which would outweigh the importance of choosing the most sustainable locations. Nor does it reflect the impact that the infrastructure and environmental constraints would have on deliverability.</p> <p>Blofield is allocated modest housing growth because of its location within the Norwich Policy Area. This reason is not expanded upon but should not be regarded as a constraint upon development. Indeed its location in relation to Norwich is a benefit.</p> <p>Blofield is one of the closest key service centres to Norwich and this has significant benefits in terms of accessibility to jobs, services and leisure. There are regular bus services to Norwich taking less than 25 minutes to get to the City centre. Proximity to the largest employment, leisure and services base must be seen as a significant benefit in terms of sustainability.</p>	



	<p>Blofield is free from the environmental and infrastructure constraints which will restrict, frustrate and delay development at other key centres. The allocation for Blofield should be increased as it is an appropriate sustainable location for part of the 2,000 dwellings to be provided on small and medium sized site within the Broadland NPA.</p>	
7522	<p>King Sturge The most significant constraint to growth is the tightly defined settlement boundary around Blofield. This limits the opportunities for accommodating new housing development. King Sturge seek to overcome this through a minor extension to the settlement boundary at Garden Farm. The minor extension would follow the defined tree line and defensible boundary, and would not represent urban sprawl, but rather a sustainable extension to the settlement.</p>	
7590	<p>Norfolk Wildlife Trust Exception polices should seek to give the same level of protection to biodiversity as in other developments. There have been at least two cases in Norfolk last year where permission was sought to build on County Wildlife Sites under exception policy</p>	
7643	<p>Bidwells As described in the answer to question 22, Gladedale (Anglia) does not believe there are any significant constraints to delivering growth of a minimum of 200 dwellings in Hethersett. However, it is recognised that delivering major growth (4000 dwellings) in Hethersett would require a range of improvements in transport, utility supply, and social and economic infrastructure.</p> <p>I want to take this opportunity to reinforce the fact that Gladedale (Anglia) Ltd's site (Land North of Great Melton Road in Hethersett) is to be included in the preparation of the SHLAA. Gladedale (Anglia) Ltd has signed an option agreement with the landowner and both parties are fully committed to realising the residential development potential of this site as soon as possible.</p> <p>Gladedale (Anglia) Ltd has already undertaken a considerable amount of technical work to underpin the release of the land. A considerable amount of information about the site has already been forwarded to South Norfolk Council as part of previous LDF consultation exercises; for instance, a letter was sent to South Norfolk Council on 22 November 2006 supplying additional technical information about the site (a Transport Assessment and a Landscape, Design & Access Statement). This site could therefore be brought forward swiftly for development, thus contributing to South Norfolk Council's 5-year supply of deliverable housing sites. The information contained in the SHLAA profile is correct except as follows:</p> <ul style="list-style-type: none"> • Assumed capacity: 180-200 dwellings; • Highway improvement: none needed other than pavement across the front of the site; • Access/safety: site can be accessed safely and adequately (please see the TA); • Public transport access: very good: a half-hourly bus service to Norwich and Wymondham throughout the day and the Thickthorn park-and-ride services (which operates every 10 minutes during the day). 	



	Please accept this as Gladedale (Anglia) Ltd's formal submission to the Core Strategy and Strategic Housing Land Availability Assessment and please continue to keep me informed of progress.	
7716	Bidwells The only known constraint to delivering more than 50 dwellings on the Sunguard land is the access to and the capacity of the A140 junction as referred to in paragraph 7.23 of the Technical Consultation document. Long Stratton itself has a wide range of services and facilities which could clearly accommodate additional development. Recent consultations with Norfolk County Council however have resulted in confirmation that this capacity constraint could be increased by at least a further 100 dwellings if a computer controlled system (MOVA) were installed to regulate traffic flows through the village. It has been agreed that this would further enhance the operation of the traffic lights at Flowerpot Lane previously installed by Sunguard thereby raising the existing 20 to 50 housing number limit resulting from the A140 congestion problem. Sunguard would be prepared to contribute towards such a scheme, in the same manner as it did with the A140/Flowerpot Lane signals to facilitate the further development of its land at Chequers Road.	
7742	Kimberley & Carleton Forehoe Parish Council Any significant growth in the other key services areas is fraught with infrastructure problems.	
7804	Long Stratton Parish Council Would spoil the 'community feel' even more than has already happened! This has already been diminished by the growth that has taken place over the last 40-50 years - the Community needs bringing together not taken even further apart as would happen with large scale development..	



KEY SERVICE CENTRES - Q25 How could growth in key service centres link with your longer term investment strategies?		
	There were seven responses to this question.	
	Issues mentioned include benefits for the local economy, infrastructure and the A140 bypass. Communities mentioned include Blofield, Acle, Loddon, Chedgave, Reepham and Wroxham.	
6863	Anglian Water Services Ltd Refer to Water Cycle Study Stage 2A report	
7309	Michael Haslam Associates Ltd. Provision for the development of this site has already been made in the developer's future investment plans.	
7385	I E Homes and Property Ltd It will not	
7479	Hethersett Parish Council As per response to Q.6	
7523	King Sturge As stated above, new housing development would increase the vitality and viability of the settlement. This will attract new investment, and ensure that the Blofield's position in the settlement hierarchy is consolidated and rural deprivation is avoided. The ability for Blofield to continue to house its indigenous population will ensure patronage at local community facilities and spending at local shops is retained. Development would bring planning gain (e.g. affordable housing) and community infrastructure contributions through the CIL. This will be a stimulus for further investment. To ensure an equitable amount of growth, Blofield should be allocated 100-200 dwellings, in line with other Key Service Centres such as Acle, Loddon/Chedgave, Reepham and Wroxham.	
7743	Kimberley & Carleton Forehoe Parish Council No links	
7805	Long Stratton Parish Council The convenience of sites, and it being possible for all the infrastructure being in place, including the A140 bypass.	



SERVICE VILLAGES - Q26 What additional significant requirements would there be?		
	There were 17 responses to this question.	
	Issues mentioned include wastewater / drainage treatment capacity, educational infrastructure, employment sites, benefits for residents, STW at Aylsham, new housing in service villages, improved transportation facilities, improved mobile phone coverage, high speed internet access, development of Reedham and dispersed traffic generation. Communities mentioned include South Walsham, Trowse, Rackheath, Aylsham, Reedham, Norwich, Cantley, Tasburgh, Brundall, Blofield, Great and Little Plumstead and Long Stratton.	
6864	Anglian Water Services Ltd Service villages are beyond the scope of the Water Cycle Study. Each location would have to be reviewed in terms of wastewater treatment capacity.	
6879	South Walsham Parish Council There are problems with the sewerage pumping plant in School Road at times of heavy rainfall. This will need to be addressed. The school would need support in accommodating varying numbers of new children.	
6923	Trowse Primary School 10-20 new dwellings would be unlikely to require significant new infrastructure. However it should be noted that the school is at capacity and has no room to expand.	
6960	Woods Hardwick Planning The service villages should be viewed on an individual basis in regard to their requirements. When opportunities are present, for example to redevelop or expand employment sites, such as at Rackheath, these should be taken especially when they accord with the aims of the Core Strategy.	
6967	Andrew Pym Chartered Surveyor Development in Service Villages should be assessed individually to identify what is appropriate to achieve real benefits for existing and new residents; key opportunities are the maintenance or improvement of facilities and the potential to reduce the need for residents to travel by car. The proposed level of development at 10-20 houses for each village should not be prescriptive; any development should be considered against sustainability criteria, including the benefits to existing residents. To achieve the Spatial Vision, the criteria for Service Villages should include some evening bus service (but not necessarily every evening) to allow access to cultural events; they should include a pub as this also provides a focus for a significant part of the community.	
6995	Michael Haslam Associates Ltd Following a telephone conversation this morning I am pleased to provide you with Anglian Water's final comments on providing capacity for the development of 600 dwellings. The STW at Aylsham is at its volumetric limit and therefore to accommodate for flows from already approved developments the entire process system at the STW will require upgrading, including storage	



	tanks and settlement filters. To accommodate your development further capacity increases to their programmed improvements will be required. Anglian Water have confirmed that there is sufficient land available within the boundary of the current STW to accommodate this. Anglian Water have also provided an indicative cost to increase capacity at the STW, specifically for the development of 600 dwellings. This is approximately £1,000,000.00 and is above the previously programmed costs to increase capacity at the STW. This information has been obtained verbally from Anglian Water and we expect confirmation via email by the end of the day.	
7077	Mr J Peacock If proposed Policy 8 were adopted in its current form, the amount of new housing that each "Service Village" will be expected to accommodate over the Plan period would be modest. There would be no requirements for significant infrastructure improvements to accommodate the scale of development proposed.	
7156	Mr Chris Mutten Paragraph 7.27 sets out the minimum level of services which a settlement must contain in order to be designated a Service Centre. Reedham benefits from many supporting services beyond those set out in paragraph 7.27 of the consultation document. In addition to the services listed it has public houses, a medical centre, post office and a mobile library. There is also a railway station at Reedham which provides services into Norwich and also to Cantley where there is a significant employment opportunity at the sugar beet factory. Given the services that are available, we believe that development beyond 10 to 20 dwellings would be appropriate in Reedham and there would be no significant additional infrastructure requirements.	
7222	Salhouse Parish Council Better pedestrian facilities - footways (not pavements) at sides of main roads. Cycle routes - main roads too busy for safe cycling. Sewage and drainage - surface water on roads is a problem after moderate rainfall; frequently flood after heavy rainfall; effluent forced back up drains onto roadways. Reduction of through traffic by re-routing via NDR. Removal of the HGV route through village - 7.5T limit. Improved access to rail station. Improved mobile phone coverage Hi speed internet access Others - no comment	
7334	Chris Mutten "Each service village identified below will be expected to accommodate 10 to 20 new dwellings as well as small scale employment or service development appropriate to the needs of the village and its immediate surroundings. Local shops and services will also be protected...." 2.2 Reedham has been identified as a Service Village in the above policy. This is on the basis that it has a minimum of a village hall, a journey to work bus service (to Norwich and/or a Key Service Centre), primary school and a food shop. Paragraph 7.28 of the consultation document states that service villages will provide an additional total of some 300 to	



	<p>600 new homes to provide for limited housing growth to meet a range of local needs including affordable housing. Small scale local employment opportunities may also be pursued to diversify the local economy where necessary.</p> <p>2.3 We would support the identification of Reedham as a Service Village but believe that in the case of Reedham development of more than 10 to 20 dwellings would be appropriate. This is due to the fact that Reedham has a significant level of services which means it can sustain development of a larger scale.</p> <p>Paragraph 7.27 sets out the minimum level of services which a settlement must contain in order to be designated a Service Centre. Reedham benefits from many supporting services beyond those set out in paragraph 7.27 of the consultation document. In addition to the services listed it has public houses, a medical centre, post office and a mobile library. There is also a railway station at Reedham which provides services into Norwich and also to Cantley where there is a significant employment opportunity at the sugar beet factory. Given the services that are available, we believe that development beyond 10 to 20 dwellings would be appropriate in Reedham and there would be no significant additional infrastructure requirements.</p>	
7386	I E Homes and Property Ltd None if more growth is allocated to those better served service villages by road and public transport such as Tasburgh which fronts the A140 and has a good peak bus service towards Norwich and south.	
7480	Hethersett Parish Council No comment	
7491	Ingleton Wood Upgraded public utilities Public transport improvements Creation/ enhancement of green links	
7659	Highways Agency Policy 8 • Service Villages Twenty-eight service villages have been identified in the Plan, accommodating 10-20 new dwellings and some small scale development. From the Highways Agency's perspective, these villages will be beneficial as they will disperse the traffic generated thereby reducing the impact on a specific section of the Trunk Road, even though a number of the villages (eg Brundall and Blofield) are within the A47 Trunk Road corridor.	
7673	Barton Willmore Policy 8 - Service Villages 2.3 Great & Little Plumstead Parish is identified at Policy 8 as a 'Service Village' within Norwich Policy Area. Policy 8 states that each service village will be expected to accommodate 10 to 20 new dwellings as well as small-scale employment or service development appropriate to the needs of the village and its immediate surroundings. The supporting text	



states that the Services Villages (30 in total) will provide an additional total of some 300-600 new homes throughout the plan area.

2.4 Our client does not support the allocation of Great & Little Plumstead as a service village and would argue that the 12 villages located within the Norwich Policy Area, including Great & Little Plumstead Parish should be defined as urban fringe parishes as identified in the settlement hierarchy at Policy 1.

2.5 Paragraphs 7.27 to 7.29 give little in the way of reasoned justification to support the limited amount of new development (10-20 new dwellings per village) identified for each service village at Policy 8. The SHLAA is being prepared as an evidence base to support the Joint Core Strategy.

However, this is at the early stages of its preparation and therefore there is no evidence at present to support the statement that only 10-20 new dwellings should be provided within each service village. Further, Policy 8 does not make clear if the 10-20 dwellings is per annum or in total over the plan period.

2.6 Little Plumstead Hospital has already been partially re-developed for residential use (east site). Broadland Council approved a development brief, which supports residential use for the west site, in April 2007. Broadland Council and Great & Little Plumstead Parish Council have therefore broadly accepted the re-development of the west site for residential use, subject to the new development retaining the footprint of the existing buildings on the site. Re-development for residential use will help deliver a number of benefits including a new primary school within a safe and integrated residential development on the west site, which is a key priority for the local community. A new primary school is identified as essential to support small scale growth in service villages at Paragraph 7.27.

2.7 Therefore, it is already widely accepted by the Council and Parish Council that Little Plumstead Hospital West will be re-developed for residential use. The site is capable of accommodating approximately 150 residential dwellings at minimum PPS3 net densities (30dph) and this should be acknowledged within the Joint Core Strategy and SHLAA. The site is brownfield, redundant and is capable of meeting local housing needs in the short term. The Joint Core Strategy, without any evidence base, should not suggest at Policy 8 that service villages should be restricted to providing 10 to 20 new dwellings each.

2.8 Policy 8 should allow flexibility in the numbers of new dwellings provided in service villages, to allow for individual local need and opportunities, and to accord with PPS3, which seeks to make the most efficient use of land.

2.9 Paragraph 7.2 of the Joint Core Strategy Technical Consultation Document refers to a preference for new development on brownfield sites. At Issues and Options stage, the Core Strategy document stated that 18,000 new homes will be needed on green sites outside of the urban area, in order to meet the targets required by the East of England Plan. The Technical Consultation Document broadly specifies how 24,000 dwellings (of the 40,000 requirement) could be distributed within



	<p>the three option areas but it fails to specify the distribution of these figures between greenfield and brownfield land.</p> <p>2.10 The Joint Core Strategy should set a hierarchy of preferred development, with brownfield development preferred to new development on greenfield sites. Growth should come from brownfield sites where they are available, and large-scale extensions should be considered secondly, where brownfield sites couldn't meet the growth required.</p> <p>2.11 Little Plumstead Hospital is a brownfield, former hospital site on the urban fringe of Norwich and within the Norwich Policy Area. The re-development of Little Plumstead Hospital West for residential use would help meet the brownfield targets for provision of new housing, and in a sequentially preferential location. It would also alleviate the need for greenfield sites to be released for new housing development.</p>	
7744	Kimberley & Carleton Forehoe Parish Council All areas would require some infrastructure development under these proposals. To plan efficiently Long Stratton should be the major growth area with service villages left alone.	
7831	NHS Norfolk There are unlikely to be significant infrastructure requirements for the service villages.	



SERVICE VILLAGES - Q27 What opportunities can growth bring?	
	There were 15 replies to this question.
	Issues mentioned include support for the existing community, objection to creation of new towns/ settlements, consolidation of existing infrastructure and services, developments within Service Villages, status of some communities as Service Villages, scope for development, development of Reedham and risk of increased crime. Communities mentioned include South Walsham, Long Stratton, Trowse, Reedham, Barford, Harleston, Diss, Salhouse and Norwich.
6880	South Walsham Parish Council Growth will support the existing community and ensure a thriving village atmosphere. Residents appreciate the existence of a village shop and this would be supported by additional housing.
6895	Thos. Wm. Gaze & Son Please find enclosed a plan of all the land under the ownership of Mr S Smith which should be considered under the Greater Norwich Development Partnership for additional housing, recreational facilities etc at Long Stratton. We also wish to put in writing our objection to the proposed creation of completely new towns/settlements in preference to the expansion of existing town/settlements. What is required for Norfolk is the even spread of residential development over all the towns, villages and hamlets throughout Norfolk. Long Stratton has good facilities already and these can be expanded upon together with a sensible amount of residential development which the town will be able to accommodate. In the original representations half of the field was included but this can be increased to include the whole field between the sewage works and the existing residential development on the East side. This is a natural infill development for Long Stratton and as you can see from the old by-pass map it is unaffected whichever way the bypass is eventually constructed, either to East or West of Long Stratton.
6924	Trowse Primary School new families in the village would help sustain the vibrancy of the village
6961	Woods Hardwick Planning This can consolidate existing infrastructure and services and reduce the need to travel and the environmental impact of development
6969	Andrew Pym Chartered Surveyor The benefits from additional development are addressed in answer to questions 1 and 26. The key is bringing forward development which can improve the position for all residents and not just those moving into the new homes and new jobs. Development may also be used to achieve more sustainable methods of providing energy for existing buildings: a change from oil or gas-fired boilers to ground source heat pumps or solar systems on village halls and primary schools would reduce the carbon footprint of the community as a whole and improve some individuals' knowledge of such systems which may result in changes in their own homes.



7078	<p>J Peacock There are demonstrable economic, social and environmental benefits to be gained from small scale development within the proposed "Service Villages". Rural areas across the district are faced with many deep-seated problems, in particular the lack of affordable market, social rented and shared equity housing. The allocation of further housing and employment land in these villages will contribute towards meeting existing housing demand within the villages, the future demand of newly forming households and towards addressing the widening gap in housing affordability. A report prepared by the Commission for Rural Communities in May 2008 on "The Assessment of and Implementation of the Affordable Rural Housing Commission's Recommendations" considers that; Whilst the rural exception site policy should be retained as a mechanism for delivering affordable housing, it should not be relied on as the principal means of meeting rural affordable housing need. Instead a greater emphasis should be on planned growth through the allocation of sites within the Local Development Framework process via cross- subsidy rather than Government investment. Past experience has shown that the exceptions site policy has been very unsuccessful as it has only delivered a small number of affordable homes. Within "Service Villages" where housing allocations are proposed, the delivery of affordable housing via cross-subsidy will be achievable with the market dwellings able to offset the costs of the affordable units. Villages like urban areas are not immune from growth pressures and without an acceptance for the need for controlled expansion, rural communities are likely to become more socially polarised. Only by permitting necessary market developments will the opportunities arise for planning mechanisms to generate affordable housing and other community benefits. It is important not only to consider the direct positive impacts that new housing and employment land would intimate but also the indirect effects that new housing can have, in particular on existing rural service provision within villages. Controlled housing and employment growth will facilitate the viability of existing services within rural areas.</p>	
7157	<p>Mr Chris Mutten Reedham has good public transport and residential growth at this settlement and would allow further improvements, particularly to the rail services to Norwich. Other opportunities would include the provision of additional affordable housing at Reedham where we understand there is a demand. Additional residential development at Reedham would also help support the existing services and continue to ensure their survival. Other opportunities that new development would bring could include landscape and ecological improvements in a location close to the Broads Authority area.</p> <p>2.6 Other development that may be acceptable is employment which would help to make the settlement more self contained and reduce the need to travel. PPS7: Sustainable Development in Rural Areas contains national policy which encourages economic development in rural areas in order to diversify the economy. Paragraph 3 specifically states:</p> <p>"Away from larger urban areas, planning authorities should focus most new development in or near to local service centres where employment, housing (including affordable housing), services and other facilities can be provided close together. This should help to ensure these facilities are served by public transport and provide improved opportunities for access</p>	



	<p>by walking and cycling. These centres (which might be a country town, a single large village or a group of villages) should be identified in the development plan as the preferred location for such development."</p> <p>2.7 As Reedham is designated as a Service Centre it is clear from the above national guidance that further development at Reedham is acceptable in principle and a commensurate scale of housing development should be allowed. This would have the benefit of supporting the existing services at Reedham.</p>	
7163	<p>Bidwells Mr G Mackintosh objects to the identification of Barford as an 'Other Village' in the settlement hierarchy as the policy wording potentially appears to restrict any practical growth. Whilst recognising that these villages will have development boundaries it is unclear what "will only accommodate in full or small groups of dwellings and small scale business or services" actually means in practice. It is therefore unclear whether the level of 'growth' attributed to Barford over a significant period (2006-2026) will actually sustain the existing village of 508 people in 211 households (2001 Census).</p> <p>Barford has a range of facilities including a primary school, public house, church, village hall with playing fields and hairdressers. It also has bus service provision to the higher order settlements of Hingham, Watton and Norwich.</p> <p>Pertinently Barford also has an employment base on the B1 108 Watton Road with the Fiat Garage, Barford Van and Truck Hire, and moreover Barford Industrial Estate that provides a relatively significant range of business units. As such Barford would therefore appear far more sustainable in employment terms than some of the other settlements listed within the 'Other Villages' category. Mr G Mackintosh recommends that access to local employment should therefore be considered as a service also essential to support growth.</p> <p>As such Mr G Mackintosh considers that the village be allowed to grow to a sufficient extent to meet the housing and employment needs of the local area and further underpin existing services (such as the Primary School) and facilities and potentially attract new ones.</p> <p>With the presence of an employment base it is therefore suggested that Barford should be located within the higher order settlement category of 'Service Village'. Such a categorisation would allow relatively small scale growth that could be sensitively related to the form, character and setting of the village whilst also providing affordable housing in triggering the requisite threshold. Such housing would enable local people to remain living in the communities in which they grew</p> <p>Notwithstanding this Mr G Mackintosh also contends that the current emerging policy approach of limiting growth in such villages (Service Villages) to 10 to 20 new dwellings is too limiting, and not adequately justified. Mr G Mackintosh suggests that in accordance with the East of England Plan (Regional Spatial Strategy), that growth targets for the Service Villages should not be expressed as ceilings to development, rather that they are minimum targets to be achieved and go beyond in appropriate circumstances, such as to achieve sustainability objectives</p>	



	<p>and to deliver mixed and balanced communities.</p> <p>Mr G Mackintosh contends that with the increasing costs of travel people may be less willing to travel where services and facilities are locally available. As such it is imperative that efforts are made to secure the ongoing viability of these for the longer term for the benefit of existing and potential residents. One way of achieving this is to provide a flexible planning approach for sustainable growth, rather than an arbitrary cap (numbers) on development as appears in Policy 8.</p> <p>Mr G Mackintosh suggests that a suitable approach should require more detailed assessments of the social and economic needs and requirements of individual settlements, assessments of the capacity of infrastructure, services and facilities in settlements to accommodate growth and judgements on the environmental capacity of areas to accommodate growth without unduly impacting on environmental assets. In essence there needs to be consideration of what each of the settlement needs to ensure its ongoing sustainability.</p>	
7180	<p>Hopkins Homes Ltd The role that the existing market towns of Harleston and Diss, together with many of the larger settlements within the wider rural surroundings can play by accommodating a significant proportion of this growth should therefore not be underestimated.</p> <p>It is pleasing to note that via Policies 6 to 8 of the current Technical Consultation document, there appears to be some acknowledgement of this fact, with a slight increase in the numbers of new dwellings now proposed for the market towns and larger villages put forward by the Partnership compared to the stance suggested within the previous 'Issues & Options' Consultation. However, in view of the aforementioned circumstances, Hopkins Homes is of the view that additional scope exists to further increase the proportion of new dwellings to be developed within these settlements</p>	
7223	<p>Salhouse Parish Council Salhouse only - Greater support and sustainability for local shop and pub and other businesses. Others - no comment</p>	
7335	<p>Chris Mutten Reedham has good public transport and residential growth at this settlement and would allow further improvements, particularly to the rail services to Norwich. Other opportunities would include the provision of additional affordable housing at Reedham where we understand there is a demand. Additional residential development at Reedham would also help support the existing services and continue to ensure their survival. Other opportunities that new development would bring could include landscape and ecological improvements in a location close to the Broads Authority area.</p> <p>2.6 Other development that may be acceptable is employment which would help to make the settlement more self contained and reduce the need to travel. PPS7: Sustainable Development in Rural Areas contains national policy which encourages economic development in rural areas in order to diversify the economy. Paragraph 3 specifically states:</p> <p>"Away from larger urban areas, planning authorities should focus most</p>	



	<p>new development in or near to local service centres where employment, housing (including affordable housing), services and other facilities can be provided close together. This should help to ensure these facilities are served by public transport and provide improved opportunities for access by walking and cycling. These centres (which might be a country town, a single large village or a group of villages) should be identified in the development plan as the preferred location for such development."</p> <p>2.7 As Reedham is designated as a Service Centre it is clear from the above national guidance that further development at Reedham is acceptable in principle and a commensurate scale of housing development should be allowed. This would have the benefit of supporting the existing services at Reedham.</p>	
7387	I E Homes and Property Ltd Jobs and contingency to growth targets.	
7481	Hethersett Parish Council No comment	
7492	Ingleton Wood More sustainable settlement, well linked with surrounding area Cultural benefits, increased accessibility	
7745	Kimberley & Carleton Forehoe Parish Council Increased opportunities for public disorder and crime in these currently rural areas.	



SERVICE VILLAGES - Q28 What are the constraints to delivering the proposed level of growth and how can these be overcome?		
	There were 19 responses to this question.	
	Issues mentioned include impacts on environment / landscape / conservation, flood risk, traffic, infrastructure development, effects on SSSIs / reserves, categorisation of Ditchingham, archaeological sites, rural employment opportunities, status of Barford, conservation areas status of Salford, development in Trowse, site availability, improved services, development should be directed to Flood Zone 1, green infrastructure, exception policies and existing infrastructure. Communities mentioned include South Walsham, Trowse, Brooke, Ditchingham, Great Witchingham, Horsford, Newton Flotman, Reedham, Acle, Blofield, Brundall, Reepham, Wroxham, Barford, Salhouse, Tasburgh and Long Stratton.	
6881	South Walsham Parish Council There are several sites suitable for development - already identified on the site specific map.	
6925	Trowse Primary School The obvious constraints are <ul style="list-style-type: none"> • Potential impact on the conservation area • Potential impact on the Southern Bypass Landscape protection zone • Potential impact on the River Valley • Increased surface water run off creating flood risk • Traffic; Trowse is accessed off the County Hall roundabout which is at over capacity. Also Trowse is used as a 'rat run' which creates danger for the children. 	
6962	Woods Hardwick Planning Significant infrastructure development, where this growth is due service village should be elevated to accommodate greater levels of investment.	
6971	Andrew Pym Chartered Surveyor The constraints to development in the right place in most rural villages are few. Proper consideration must be given to environmental and landscape issues, along with the integration of the development into the community but the Strategy should allow the merits of each proposal to be considered on the basis of their merits, alongside criteria which allow the sustainability and community benefits to be assessed.	
7014	Natural England See above. Additional designated sites not previously raised in relation to specific options: Brooke - Shotesham Common SSSI and Shotesham-Woodton Hornbeam Woods SSSI Ditchingham - Broome Heath Pit SSSI; Broome Heath LNR; Bath Hills LNR Great Witchingham - Alderford Common SSSI Horsford - Horsford Rifle Range (Norwich Fringe Project) Newton Flotman - Smockmill Common LNR Reedham - Breydon Water SPA and Ramsar South Walsham - South Walsham Fen LNR	



<p>7076/9</p>	<p>J Peacock The village of Ditchingham contains a range of facilities and services and we take the view that it should be categorised as a "Key Service Centre" and not a "Service Village" as proposed in the Technical Consultation Document, August 2008. Ditchingham contains a population of nearly 1,700 residents and is strategically well located within the district being approximately 2 miles north of Bungay and positioned on the Norfolk/Suffolk border. Whilst the village may not contain all of the facilities set out within paragraph 7J6 of the document, this list of facilities in our view is not a good indicator of sustainability. Of principal importance is the strategic position of the village within the District and the wider hinterland and the accessibility of the village to key services by public transport. All of the facilities outlined in paragraph 7.16 can be accessed from Ditchingham and Broome via public transport. Our response to this question relates only to the "Service Village" of Ditchingham where it is considered that there are no known constraints which would hinder the delivery of the proposed level of growth set out in Policy 8 of the Joint Core Strategy Technical Consultation Document.</p>	
<p>7098</p>	<p>Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.</p>	
<p>7158</p>	<p>Mr Chris Mutten The land shown at Appendix 1 is owned by our client and would be immediately available for development. There are no particular constraints to delivering housing on this site and given the level of services and public transport accessibility we believe this site should be allocated for residential development. The level of services at Reedham is sufficient to support further growth beyond the 20 dwellings set out in Policy 8.</p> <p>3.0 POLICY 14 - HOUSING DELIVERY</p> <p>3.1 According to this policy provision needs to be made for at least 40,000 new homes between 2006 and 2026. Of these 36,000 will be in the Norwich Policy Area. This still leaves 4,000 homes to be found outside the NPA. According to the Table at paragraph 8.4 of the consultation document 1,130 homes need to be allocated in the Broadland Rural area.</p> <p>3.2 Even with the development proposed at Acle, Blofield, Brundall, Reepham and Wroxham there will still be a need to allocate some residential development elsewhere in Broadland District to meet the above target. Consequently, with the level of services available in Reedham, there should be further allocation of development at Reedham beyond 20 dwellings set out in Policy 8. Our client's land at Reedham is ideally suited for residential development as there are no constraints which need to be overcome and the site could be developed immediately.</p> <p>3.3 A mix of housing could be developed on our client's site to meet specific local housing need as envisaged by this policy.</p>	



	<p>4.0 POLICY 15 - THE ECONOMY</p> <p>4.1 Policy E1 of the East of England Plan states that Norwich, Broadland and South Norfolk should provide 35,000 jobs within the period 2001-2021. The previous version of the Joint Core Strategy contained a section which dealt with employment matters and set out a number of options for small scale employment growth. These were:</p> <p>"(a) requiring all new larger housing developments to include employment uses and/or encouraging a flexible approach to residential units such as specific live/work units; (b) ensuring smaller employment sites are available, particularly to support smaller businesses and start-ups in identified settlements or, for example, through conversion of rural buildings; (c) ensuring there is adequate provision for managed workspace, "growing on" units and low cost areas for more marginal businesses across the city and the wider area."</p> <p>4.2 However, this current consultation does not give any support to the rural economy beyond stating:</p> <p>"...In the rural areas the economy and diversification will also be supported by</p> <ul style="list-style-type: none">• A preference for the re-use of appropriate redundant agricultural buildings for commercial uses, including holiday homes to support the tourism industry (affordable housing may be an acceptable alternative use).• Promotion of farmers markets and farm shops in villages." <p>4.3 From the above it seems that there has been a removal of the Councils' acknowledgement that appropriate scale employment opportunities should be encouraged across the rural area to serve local needs (Question 24 of the previous consultation refers). It is crucial that smaller villages such as Reedham benefit from further employment development and it would help to achieve a greater balance between homes and jobs which would also reduce the need to travel.</p> <p>4.4 The rural economy is supported by national policy set out in PPS7: "Sustainable Development in Rural Areas". Paragraph 4 of this document states that:</p> <p>"Planning authorities should set out in LDD's their policies for allowing some limited development in, or next to, rural settlements that are not designated as local service centres, in order to meet local business and community needs and to maintain the vitality of these communities.."</p> <p>4.5 In light of this national advice we would support a policy which would specifically allow for small-scale growth in villages other than key service centres.</p>	
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7164	<p>Bidwells In conclusion, Mr G Mackintosh contends that Barford should not be designated as an 'Other Village', but rather a 'Service Village' given the presence of an - employment base that should be considered an essential service to support sustainable growth. In order to provide the Joint Core Strategy with the flexibility needed to ensure Service Villages (Policy 8) are allowed to grow to meet the needs of the community, Mr G Mackintosh suggests that the wording should be changed to accommodate at least 10 to 20 new dwellings as well as small scale employment or service development appropriate to the needs of the villages and its immediate surroundings. Further growth will be accommodated where it can be demonstrated that it would contribute to meeting the needs and requirements of the village and its surroundings and where sufficient capacity exists or can be provided to serve the growth and where it would not unduly impact upon existing environmental assets.</p>	
7224	<p>Salhouse Parish Council Salhouse is a Conservation Area and is adjacent to the Broads Authority jurisdiction. Any development must be sympathetic to these. Others - no comment</p>	
7255	<p>Les Brown Associates Trowse should be included as an area for estate scale development</p>	
7336	<p>Chris Mutten The land shown at Appendix 1 is owned by our client and would be immediately available for development. There are no particular constraints to delivering housing on this site and given the level of services and public transport accessibility we believe this site should be allocated for residential development. The level of services at Reedham is sufficient to support further growth beyond the 20 dwellings set out in Policy 8.</p>	
7388	<p>I E Homes and Property Ltd Some of the service villages are poorly served by road and public transport and these constraints can be overcome to allocating more of the growth to those well served in these areas such as Tasburgh which will also benefit from growth at Long Stratton and vice versa Long Stratton if Tasburgh takes growth.</p>	
7449	<p>Environment Agency (Eastern Area Office) No significant issues with these villages, however, growth should be directed towards flood zone 1 and should incorporate green infrastructure enhancement as part of the wider Norfolk strategy.</p>	
7482	<p>Hetherset Parish Council No comment</p>	



7493	Ingleton Wood Impact on landscape character, environment, ecology Requiring landscape appraisals for major developments Requiring a higher level of sustainability, lower carbon emissions	
7591	Norfolk Wildlife Trust Exception polices should seek to give the same level of protection to biodiversity as in other developments. There have been at least two cases in Norfolk last year where permission was ought to build on County Wildlife Sites under exception policy	
7746	Kimberley & Carleton Forehoe Parish Council Existing infrastructure.	



SERVICE VILLAGES - Q29 How could growth in service villages link with your longer term investment strategies?		
	There were 13 responses to this question.	
	Issues mentioned include wastewater treatment capacity, sustainability of village school, integration with major growth locations, allowing development in the absence of major sites, status of Barnham Broom, status of Dickleborough, land availability, parish council income and status of Rackheath. Communities mentioned include Trowse, Barnham Broom, Dickleborough, Tasburgh, Diss, Salhouse, and Rackheath.	
6865	Anglian Water Services Ltd Any increase in wastewater treatment capacity would be funded through the water industry's regulatory process (see water cycle study for details)	
6926	Trowse Primary School Limited growth would enhance the sustainability of the village school in the future. The current school has really no room for major expansion.	
6963	Woods Hardwick Planning Integrate these with major growth locations and elevate settlements where such growth is planned.	
6973	Andrew Pym Chartered Surveyor Development in villages and on a smaller scale in more places than the Strategy proposes will allow development to continue throughout the period for the Strategy. The problem in autumn 2008 is that the development strategy cannot be delivered as proposed because there are no opportunities to embark on the development of large scale sites; this is caused by the difficulties in funding the upfront infrastructure works and in selling the homes when built. These difficulties are likely to exist for some years, meaning that the delivery of necessary new development will be frustrated.	
7000	Barnham Broom Parish Council Barnham Broom, whilst meeting the criteria for a service village, has not been included in the listing. We strongly suggest that this is revised!! We have : Village Hall Regular Bus Service to Norwich via the NNUH Primary School Food Shop Post Office (confirmed as safe following PO Network Review) and could, subject to necessary permissions/consents, easily accommodate 10 to 20 new dwellings within existing boundaries.	
7181	Hopkins Homes As I have previously highlighted, the village of Dickleburgh is one such settlement where Hopkins Homes considers scope exists to provide for additional residential and employment growth, together with complimentary community facilities. Dickleburgh is already one of the largest villages within the rural part of the existing South Norfolk District, with a population of 1300. It benefits from a variety of existing facilities including a Village Store, a Doctors Sub	



	<p>Branch Surgery, Village Centre (Sports and Social Club), Public House, Primary School, Recreation Ground, Sea Scouts Hall, Reading Room, Church Hall, Parish Church (All Saints) and a Coach Depot.</p> <p>The village is well located to the main highway network, close to the A140 primary route, and benefits from good connectivity with the other nearby larger settlements of Diss, Long Stratton and Harleston, where Policies 6 and 7 envisage further growth. It also benefits from a convenient and regular bus service to both Norwich and Diss, and sits within the broad 30 minute isochrone to the city of Norwich, representing the general definition of the Norwich Sub Region within the Regional Spatial Strategy. In this context, Hopkins Homes would suggest that the village already acts as a 'Key Service Centre' rather than as a 'Service Village' as currently purported through this Technical Consultation document, such that it could comfortably accommodate development some way in excess of the 10 -20 dwellings suggested at present.</p>	
7225	Salhouse Parish Council Greater Precept income	
7351	<p>Mr Jim Hamshaw Barnham Broom, whilst meeting the criteria for a service village, has not been included in the listing. We strongly suggest that this is revised.!!</p> <p>We have :- Village Hall Regular Bus Service to Norwich via the NNUH Primary School Food Shop Post Office (confirmed as safe following PO Network Review) and could, subject to necessary permissions/consents, easily accommodate 10 to 20 new dwellings within existing boundaries.</p>	
7389	I E Homes and Property We will make available brownfield land in Tasburgh for housing and employment development.	
7483	Hetherset Parish Council No comment	
7494	<p>Ingleton Wood It is considered that there is potential for significant growth in service villages beyond the projected 10-20 dwellings.</p> <p>We are currently assessing the viability of various potential development sites in the district and consider that new housing development in Dickleburgh would benefit from its proximity to Diss.</p>	
7636	CGMS Ltd Policy 8 identifies both Salhouse and Rackheath as service villages. While the policy may be appropriate for the former, the integration of Rackheath within our proposed eco-community would be at variance with Policy 8 and we would suggest it is excluded from the list of service villages (possibly replaced by a generic statement referring to new district centres in strategic growth locations).	
7748	Kimberley & Carleton Forehoe Parish Council No links	



OTHER PLACES - Q30 Do you agree with the approach to development in other villages, the countryside and the Broads?		
	There were 42 responses to this question. Fourteen respondents agree, and eight object.	
	Issues mentioned include unsuitability of Wroxham as a service centre, inconsistency of approach to Little Melton, protection / expansion of community and village halls, employment uses, omission of Foulsham as a Service Village and inclusion as an Other Village, SSSIs and nature reserves, Easton's designation as an Other Village, supply of land in smaller rural villages, pressure on the Broads, status of Hempnall, status of Brampton, status of Barnham Broom, protection of the broads, CIL mechanism, exception policies, status of Kirby Cane, highway improvements/ traffic, status of Brampton, and status of Wortwell. Communities mentioned include Wroxham, Hoveton, Little Melton, Frettenham, Foulsham, Barnham Broom, Bressingham, Cantley, Ellingham/ Kirby Row, Gillingham, Woodton, Easton, Costessy, Salhouse, Hempnall, Brampton, Bramerton, Rackheath, Kirby Cane, Bawburgh, Thorpe St Andrew, Colney, Cringleford, Longwater, Wymondham, Elveden, Blofield, North Burlingham, Acle, Wortwell, Hethersett, Hainford, Waterloo, Great Plumstead and Wicklewood.	
6828	Beighton Parish Council supports the approach to development in other villages, the countryside and the Broads. The Council welcomes the opportunity for affordable housing on exception sites, linked to local communities.	
6902	Wroxham Parish Council Rather than respond to all 32 questions contained in the Technical Consultation, my council wish to comment on the aspects relating to Wroxham. No practical reason can be identified for a development of 100-200 houses in the village. Suitable locations are very limited and the only realistic sites identified within Broadland District Council's Development Plans resulted in a public enquiry and were dismissed by the Inspectorate. My council considers that his reasoning still applies and continue to support it. While "Wroxham" name is promoted as the gateway to the Broads the majority of the services including retail outlets are in Hoveton. Schools, primary health care, two community halls and substantially higher employment opportunities are in that parish In recent years Wroxham has lost a full time shop/Post Office, Public House and several boatyards producing employment have been redeveloped for residential use. In summary, my council considers it inappropriate to designate Wroxham as a service centre and unsuitable to accommodate the scale of additional houses suggested in the Technical Consultation.	
6914	Little Melton Parish Council Yes we do agree - but it is inconsistent to categorize Little Melton as an 'Other Place' and then make it part of a new town!	
6916	Theatres Trust Object: Given that there is no dedicated theatre outside Norwich we would expect there to be references to the protection of community and village halls in the region's villages for arts and cultural	



	<p>use to meet objective 12. Although community centres/halls are also mentioned in the spatial vision they are not mentioned in any policy. Future development of the smaller settlements could well include theatrical provision for community centres/halls, a new arts centre or indeed amateur theatre attached to local pubs. This would boost their viability and vitality and the content of a policy should specifically include the protection and enhancement of your village facilities and services.</p>	
6964	<p>Woods Hardwick Planning Provision should be made to redevelop or intensify existing employment uses where such a use would fit in with the principles of the Core Strategy. This would mean that existing opportunities, such as the site at Buxton Road, Frettenham are not lost where they are closely related to the settlement, and to the urban area of Norwich, and could provide part of the jobs provision with little need for infrastructure provision or have a negative environmental impact.</p>	
6976	<p>Philip Hendry & Sons welcomes the recognition that Service Villages can make a meaningful contribution to the delivery of new dwellings and employment which will ultimately secure the long term future and improve the sustainability of such Service Villages but objects to the omission of Foulsham from Policy 8. Paragraph 7.27 states that the service considered essential to support the scale of growth indicated in Service Villages are as follows:</p> <ul style="list-style-type: none"> • Village hall • Journey to work bus service (to Norwich and/or a Key Service Centre) • Primary School; and • Food Shop <p>Foulsham contains all of the services listed above as well as other, a comprehensive list of which is produced here. Philip Hendry & Sons request that Foulsham is reclassified as a Service Village, given the level of services it offers and its established public transport links.</p> <p>Foulsham Services</p> <ul style="list-style-type: none"> • The New Frost Hall (complete with bar, badminton court and well established playgroup) Bus service linking Foulsham to Norwich and Fakenham stops twice in the village and provides access to the national rail network (time table attached) • Foulsham County Primary School • General Food Store • Post Office and Shop • Queens Head Public House • Ivy House Bed and Breakfast • Avocet Hair Salon • Baptist Church • Holy Innocents' Church • Foulsham Employers • Four Building Contractors • Funeral Directors • M.Morgan Motor Engineering • Hobbs Toy Retailer • Ray Lake Electricians • Powley's Business Park • Sandon Saddlery • Kayo Conversions 	



	<ul style="list-style-type: none"> • Powley's Office Furniture • R & D Metcalf Ornamental Metalwork • M. J. Stacey Joinery Workshop • Break Charity <p>The above list of services and employment providers illustrates the highly sustainable nature of Foulsham given its service and employment opportunities. Foulsham exceeds the level of service provision required by Service Villages and as such ought to be reclassified as a Service Village. The figures associated with new dwellings within the Service Villages as identified in Policy 8 suggest that between 10-20 dwellings will be expected to be provided by each Service Village. The policy should clarify that these figures are a target and not necessarily a ceiling. Where suitable sites exist, and associated community benefits could be provided, new residential development within Service Villages might sensibly exceed the 20 dwelling threshold and possibly number up to 30 dwellings in exceptional circumstances. Philip Hendry & Sons wish to object to the designation of Foulsham as an Other Village and believe that it should be reclassified as a Service Village given the level of service and employment provision outlined above.</p>	
7001	Barnham Broom Parish Council No - please see response to Question 29 - we contend that Barnham Broom is listed in the wrong section!	
7015	<p>Natural England See above. Sites not highlighted elsewhere:</p> <p>Bressingham - Redgrave & Lopham Fens SSSI, NNR and Ramsar (component site of the Waveney & Little Ouse Valley Fens SAC)</p> <p>Cantley - Cantley Marshes SSSI (component site of the Broads SAC, Broadland SPA and Ramsar); Mid Yare NNR</p> <p>Ellingham/Kirby Row - Leet Hill Kirby Cane SSSI</p> <p>Gillingham - Geldeston Meadows SSSI and Stanley and Alder Carrs, Aldeby SSSI (component site of the Broads SAC, Broadland SPA and Ramsar)</p> <p>Woodton - Hedenham Wood SSSI and Sexton Wood SSSI</p>	
7033	<p>Easton College The document is contradictory with regards to the approach to Easton. The Options refer to growth at Costessey/ Easton. However, Easton is identified by Policy 9 as an "Other village" where development would be limited to small groups of dwellings. As set out in our accompanying masterplan framework we propose that Easton be identified in the Core Strategy as a key location for growth and investment to support the expansion of educational facilities, to build on the Food hub concept and improve the sustainability of the settlement . In Proposed Policy 1 the reference to Costessey in the first bullet should be amended to "Costessey/ Easton"</p>	
7080	<p>Mr J Peacock South Norfolk is a predominantly rural area with a high percentage of its population living in either villages or rural areas. Whilst the vast majority of new housing and employment will be located within the Norwich priority area, we say that an adequate supply of land for future housing and employment development should be allocated also within smaller rural villages across the three districts during the Plan period.</p> <p>Whilst PPG13: Transport encourages the majority of new development to be located within towns or key services centres, it does not promote the complete concentration of new development within these areas. It</p>	



	<p>recognises the importance of promoting adequate employment opportunities and housing in rural areas in order to reduce the need for long distance commuting to jobs. From an economic point of view, if no further housing is permitted within these villages then demand for housing will increase. If the demand is not met by new development the economic implications are that house prices within this area will rise. This will result in a widening gap in housing affordability and will mean that newly forming households will not be able to afford to live within the area where they were brought up. Social implications of supply not meeting demand within these areas would mean that the villages and their rural communities would become more socially polarised.</p> <p>Only by permitting necessary market developments can opportunities arise to use planning mechanisms to generate affordable housing and other community benefits. Local authorities must consider the needs of existing residents and the growth pressures they face. This should be dealt with by controlled expansion in rural areas to avoid villages becoming more socially polarised. An appropriate amount of new development in rural settlements can help support local services and facilities and sustain the local economy resulting in less need to travel. Whilst people living within rural areas do make use of the private car more than people living in urban locations, when considering the location of new development, social and economic as well as environmental considerations should be taken into account and the economic and social values that new development can bring should be set against environmental constraints. This approach is clearly amplified by Central Government policy, which defines sustainable development as:</p> <ul style="list-style-type: none"> • Social progress which recognises the needs of everyone. • The efficient use of natural resources, and • the maintenance of high and stable levels of economic growth and employment. <p>The allocation of land within other villages for housing will allow these villages to grow, will ensure their vitality and prosperity and will contribute to realising the housing targets set out within the Joint Core Strategy. Sustainable development cannot be based solely on strategies of urban concentration. Instead, it requires an integrated approach whereby jobs and housing are located in rural as well as urban areas. It is important to highlight that the need to reduce travel should not be regarded as a criteria for sustainability but rather a need to reduce CO2 emissions produced by current forms of road traffic.</p>	
7089	Hevingham Parish Council Yes, provided the development boundaries are reviewed regularly to ensure the villages are allowed to breathe and not stagnate.	
7226	Salhouse Parish Council No - in relation to the Broads, Policy 11 needs to be strengthened. Increased local development (eg. at Rackheath) will bring increased leisure activity pressure on Salhouse Broad. This in turn will affect the whole of Salhouse as most of the village is adjacent to Broads Authority land and will be affected by it.	
7246	RPS We do not agree with the approach that has been taken with regards to development in 'Other Villages' as the Core Strategy proposes that in these settlements there will only be the opportunity for infill or	



small scale developments including limited new housing.

It is considered that Hempnall is an appropriate location for future growth but this settlement has been categorised as an 'Other Village'.

Hempnall is located approximately 14 km to the south of Norwich and 3.5 km to the east of the A140 which provides the primary road link north to Norwich and south towards Ipswich. Hempnall has a range of local services and facilities which include two general stores, post office, community hall, church, public house and two garages. In addition, there is an existing bus service (route between Harleston and Norwich) which runs on an hourly frequency during the week and a two hourly frequency on Saturdays. It is considered that allowing more growth in Hempnall will help to retain and attract services, as there will be a higher population threshold to support them.

We do not consider that the Council's approach represents the most appropriate in all the circumstances having considered relevant alternatives. Not providing for any growth other than infill or small scale development in villages is likely to lead to existing services and facilities from closing. New development should be allowed to take place to help to maintain and strengthen Hempnall's social and economic role.

Government Policy in PPS3 at paragraph 38 recognises the need to provide housing in rural areas, including within villages, to enhance and maintain their sustainability.

Most of the villages within the Greater Norwich area have been allowed in the past to experience housing and employment growth and have developed a range of facilities over time to meet local needs and to serve their surrounding rural areas. It is considered that there needs to be an approach that takes more account of the particular function of each village, how it relates to its surrounding rural area and to the service villages and key service centres and urban areas and how it should develop in the future to maintain that function.

Our client's site off Bungay Road in Hempnall (as illustrated on the attached plan) is considered to be an ideal location for future growth and its development could be assimilated well with the existing settlement and built development.

This site is approximately 1.3 hectares in size and located on the southeastern edge of the village, immediately east of Roland Drive. Immediately to the west of the site is existing residential development whilst to the east is a playing field with village hall and tennis courts. Site access is from Bungay Road to the north.

On the basis of 30-35 dwellings per hectare the site can accommodate at least 39-45 dwellings. This site was considered by the Inspector for the South Norfolk Local Plan Inquiry which took place during 1998 and 1999 to be suitable for residential development. However, at the Proposed Modifications stage South Norfolk removed the housing allocation for the site as they considered that sufficient housing land had been provided for.

With regards to access into the site this would be via an existing private



	<p>drive from the B1527 Bungay Road (this access currently serves a residential property located on the site). A Transport Study that has been completed with regards to the future development of this site concludes that there are no inherent accident problems associated with the existing road network within Hempnall. With regards to our client's site it has been concluded that a simple priority junction could be created from the B1527 Bungay Road, with the junction positioned within the site to enable appropriate visibility splays. Footways on the southern side of Bungay Road could be widened to enhance pedestrian provision and access.</p> <p>In terms of flood risk and drainage issues on the site this has also been investigated. The site is shown outside the indicative flood plain map produced by the Environment Agency and there are no watercourses within the immediate vicinity of the site. Whilst there is a pond situated in the north-east corner of the site there is no obvious outfall. It is therefore considered that there are no significant drainage issues on the site.</p> <p>It is therefore considered that villages, and in particular Hempnall, should be allocated more future residential development than just infill and small-scale schemes. A higher level of development in Hempnall will support the existing services and facilities in the village and encourage sustainability.</p>	
7293	<p>Brampton Parish Council In response to the above document we would appreciate if the Greater Norwich Development Council would include our village in policy 9 of the above document.</p> <p>Policy 9 refers to villagers that have few or no local services and would not provide a sustainable location for significant development. This would suitably describe the village of Brampton located in the area of Broadland District Council.</p> <p>the joint core strategy guides the planners in future planning applications, and whilst we do not wish to see any significant development we would like to ensure that the opportunity exist for limited infill development to provide for local needs without affecting the form and character of the village. This area would be defined by a village development limit.</p> <p>Brampton has an active village hall, community area. A bus service and is within walking distance of Buxton, which has a primary school and shops. There are also several business within the villages / parish providing local employment.</p> <p>We attach a list of local residents who have expressed their support for inclusion within the policy. (Representation accompanied by petition)</p> <p>We therefore ask that you consider our village for inclusion in policy 9</p>	
7352	<p>Mr Jim Hamshaw No - please see response to Question 29 - we contend that Barnham Broom is listed in the wrong section!</p>	
7356	<p>Bramerton Parish Council Bramerton is a village in the Countryside with a significant conservation area containing listed buildings at the heart of the village. We also have a site adjacent to the conservation which comprises a dilapidated barn complex and a weighbridge, which was the</p>	



	<p>location of a seed business and has the corresponding industrial permissions. The village was never happy with the lorry traffic to the barns and was relieved when the seed business ceased. Following barn conversions nearby, housing today is nearer to this site today and a resumption of lorries would provide a greater problem. The owners of the barn site wish to demolish the barns and redevelop the site with 6 live/work units built using sound environmental principles for sale, two affordable housing units and an extension to the office accommodation, which would be retained and let to provide another local employment location. Residents support this development as being consistent with the character of the village and an improvement to the village environment. They would be extremely unhappy with many forms of industrial development on this brown field site.</p> <p>We wish to make sure that the proposed strategy is sufficiently sympathetic to the needs of villages in the Countryside to permit changes such as this to take place. We recognise that most of the development will take place elsewhere, but we must be allowed to make improvements to our environment and changes in use, which achieve this objective, should be permitted.</p>	
7390	I E Homes and Property Ltd No as these areas tend to have a high landscape and biodiversity value and are not sustainable.	
7450	Environment Agency (Eastern Area Office) No objection to the approach being taken and support a general policy for protection of the environmental quality and character of the Broads.	
7484	Hethersett Parish Council No comment	
7495	Ingleton Wood Yes	
7547	Mr Richard Atkinson Yes, we welcome indications that the CIL mechanism will include for the assessment of viability of new development proposals so that realistic demands for infrastructure payments are made by the authorities	
7592	Norfolk Wildlife Trust Exception polices should seek to give the same level of protection to biodiversity as in other developments. There have been at least two cases in Norfolk last year where permission was ought to build on County Wildlife Sites under exception policy	
7606	Thurton Parish Council Yes	



7637	CGMS Ltd Area-wide policies Policy 13 Reducing environmental impact - we strongly support this policy, the principles of which underpin our approach to the Rackheath Eco-community. Policy 14 Housing delivery - we support this policy and welcome the approach to take account of economic viability in determining affordable housing provision. We agree that 40% is an appropriate starting point for determining affordable housing provision and will be adopting this as a target for provision in the Rackheath Eco-community. Policy 15 The economy - we support this policy but would welcome an added emphasis on ensuring key employment sites are accessible by public transport. Policy 16 Strategic access and transportation - we support this policy, particularly its emphasis on the enhanced and innovative use of the local rail network ; the use of the Norwich Northern Distributor Route to aid strategic access and provide capacity for public transport; planning development, in a way which encourages walking and cycling as the primary means of travel; and improving public transport accessibility to and between Main Towns and Key Service Centres. These will all be addressed in the Rackheath Eco-community proposals. Policy 18 Communities and culture - we particularly welcome the adoption of a spatial planning/multi-agency approach to ensure that infrastructure requirements are addressed in a holistic way. This is particularly relevant to the planning of significant new communities to ensure that new services are integrated with those which already exist and that both existing and new residents derive maximum benefit. Implementation and monitoring Policy 19 Implementation and monitoring - we support this policy, but consider that it does not go far enough in terms of supporting community development. In our view the support for community development should continue beyond first occupancy. At Rackheath we will be proposing the establishment of a local management body in accordance with this policy. We welcome indications that the CIL mechanism will include for the assessment of viability of new settlement proposals so that realistic demands for infrastructure payments are made by the authorities (Question 32). The emphasis on securing high quality design is also to be welcomed, though the phrase "accredited participatory design process" needs to be clarified. Conclusions There is a high degree of convergence between the proposals emerging in the Joint Core Strategy and the proposal to develop an Eco-community at Rackheath. In general therefore we support the Strategy and look forward to a continuing involvement in its development. Further information will shortly be provided regarding the progress of the Ecocommunity proposal.	
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<p>7649</p>	<p>Drivers Jonas</p> <p>In reference to proposed Policy 9 "Other Villages", CEMEX urges the Councils to consider Kirby Cane as an "Other Village". In particular, CEMEX urges the Councils to consider their site in Kirby Cane for residential development. The development of this site would accord with PPS1 and PPS3 as both of these planning policy statements seek development in existing settlements, in accessible locations (PPS1, Paragraph 27 and PPS3, Paragraph 36). This form of development would also improve the choice of housing within Kirby Cane, an objective of PPS3 (Paragraph 10). In addition, the development of CEMEX's site in Kirby Cane would accord with Planning Policy Statement 7: Delivering Sustainable Development in the Rural Environment (PPS7) Paragraph 1 (ii), which seeks good quality, carefully-sited accessible development in existing towns and villages where it benefits the local economy.</p> <p>CEMEX supports proposed Policy 10 "The Countryside". In particular, CEMEX urges the Councils to consider their site in Bawburgh for water sports or leisure related activities. As already set out, the southern half of the site is within the Water Recreational Area (policy BAW1) of the South Norfolk Local Plan (2007). The development of this site as a water sports area, or an another sporting activity, would provide recreational space to the wider area. This will be particularly beneficial to surrounding towns in the South West of the plan area, which are set to experience growth in proposed Policy 5. CEMEX considers the development of this site as a water sports/ recreational centre, to be in accordance with Paragraph 12 of PPG17, which states:</p> <p>"The development of water sports or leisure activities within this area may provide an opportunity for the Councils to remedy deficiencies in provision."</p> <p>In relation to proposed Policy 11 "The Broads", CEMEX supports enhancing the economy of the Broads. In particular, CEMEX urges the Councils to consider further development within Kirby Cane. Development within this village would contribute to enhancing the economy of the Broads, which is situated in close proximity to Kirby Cane. In addition, it could enhance services and infrastructure, which may attract a greater level of visitors to the area. This would boost the local economy, which would accord with PPS7, Paragraph 1 (ii):</p> <p>"Good quality, carefully-sited accessible development within existing towns and villages should be allowed where it benefits the local economy."</p>	
<p>7660</p>	<p>Highways Agency</p> <p>Policy 9 - Other Villages The effect of development in other villages will be minimal and therefore will not affect the Trunk Road network.</p> <p>Policy 10 - The Countryside The level of development permitted in the countryside is unlikely to be such that it will have a significant impact on the Trunk Road network.</p>	



However, the Highways Agency needs to be made aware of any development in the countryside that might have a direct impact on the Trunk Road.

Policy 11 - The Broads

The Highways Agency might be concerned if major growth in terms of economy (tourism) is proposed for the Broads as any traffic accessing the area may use the A47 Trunk Road.

Policy 12 - The Hierarchy of Centres

A hierarchy of centres is proposed which will develop new retailing, services, offices and other town centre uses. Growth at any centre, irrelevant of its size, will require access to and from the Trunk Road network. This is particularly the case at centres which access the Trunk Road network junctions that are already at or nearing capacity.

However, overall, this approach is favourable as it will concentrate development in the largest centres which will be able to support more sustainable modes of transport.

Policy 13 - Reducing Environmental Impact

The Highways Agency welcomes any proposals that reduce environmental impact through the provision of modes of transport in accordance with the Norwich Area Transport Strategy (NATS) and through minimising the need to travel.

Policy 14 - Housing Delivery

The Policy states that at least 40,000 new homes will be provided between 2006 and 2026, 36,000 of these will be in the Norwich Policy Area. The Highways Agency is aware that these homes will have a significant effect on the Trunk Road network and ask that any developments put forward are fully supported by transport evidence to show how they will work and if any mitigation measures are needed.

Policy 15- The Economy

Thirty-five thousand additional jobs may be created between 2001 and 2021. Policy 2 identified where some of the jobs would be located. The draft East of England Plan identified the following key strategic locations:

Thorpe St Andrew (Broadland Business Park)
Colney/Cringleford (ie Norwich Research Park)
Longwater
Wymondham (All)

The Highways Agency is aware that trips will be generated by these additional jobs and the impact they will have on the Trunk Road. Again, the Highways Agency would expect to see transport evidence to support any such proposals.

Policy 16 - Strategic Access and Transport

This policy is obviously a key one for the Highways Agency as it focuses on the need to enhance the transportation system to promote sustainable economic development and healthy travel choices and to minimise the need to use the private car.



	<p>The document identifies the following strategic improvements which would need to be delivered by the Highways Agency:</p> <p>A11 yet to be dualled at Elveden, although programmed for 2012 A47 improvements planned, however significant stretches remain single carriageway. This Policy does not specify where these improvements are required, although each option identifies a number of A47 locations that would need to be upgraded.</p> <p>The document identifies the dualling of the A47 between Blofield and North Burlingham as a Highways Agency scheme. However it does not identify whether it is seen as critical to the delivery of the Core Strategy. With the exception of Acle, the major development areas are situated on the Norwich side of Blofield. The key traffic movements generated by major development areas are likely to be to and from Norwich; and to/from destinations outside the region. Only movements to/from the Great Yarmouth area would have to use the unimproved A47 between Blofield and North Burlingham. This means that most of the development in the Core Strategy cannot be regarded as critically dependent upon the delivery of this scheme.</p> <p>By contrast, development at Acle would rely on this section of the Trunk Road to access most destinations in Norwich and beyond. It is therefore possible that the improvement of the A47 between Blofield and North Burlingham could be critical to the acceptability of a significant amount of development here. The question of how much additional development could be accepted at Acle whilst this section of A47 remains unimproved is not addressed. The Highways Agency suggests that if any substantial development is allocated here, it should be phased to occur after the Scheme is delivered.</p> <p>POLICY 17 - ENVIRONMENTAL ASSETS This policy does not directly affect the Trunk Road network.</p> <p>POLICY 18 - COMMUNITIES AND CULTURE The Highways Agency recognises that stronger cohesive communities can minimise the need to travel and this will have a positive effect for the Trunk Road network.</p> <p>POLICY 19 - IMPLEMENTATION AND MONITORING This policy states that appropriate infrastructure provision will be achieved through a variety of measures. A monitoring process that includes the features listed below would be such as to allow the Highways Agency to obtain information as to the effects of the infrastructure on the Trunk Road network: Establish objectives Define policies Set targets Measure indicators</p>	



<p>7667</p>	<p>Mr J Spinks In response to the above document we would appreciate if the Greater Norwich Development Council would include our village in policy 9 of the above document.</p> <p>Policy 9 refers to villagers that have few or no local services and would not provide a sustainable location for significant development.this would suitably describe the village of Brampton located in the area of Broadland District Council. the joint core strategy guides the planners in future planning applications, and whilst we do not wish to see any significant development we would like to ensure that the opportunity exist for limited infill development to provide for local needs without affecting the fonn and character of the village. This area would be defined by a village development limit.</p> <p>Brampton has an active village hail, community area. A bus service and is within walking distance of Buxton, which has a primary school and shops. There are also several business within the villages / parish providing local employment. We attach a list of local residents who have expressed their support for inclusion within the policy. We therefore ask that you consider our village for inclusion in policy 9</p>	
<p>7676</p>	<p>Wortwell Parish Council Wortwell Parish Council objects to Wortwell being placed in the category of 'The Countryside' (Policy 10 of the current Joint Core Strategy Consultation). Instead we wish to be considered as an 'Other Village' (Policy 9). The reasons are as follows:</p> <p>1. Although Wortwell does not have a school, there are primary and high schools in Harleston only two miles away with good connecting bus services. We note that Broome has been placed in Policy 9, yet it has no school</p> <p>2. Wortwell has a wide range of services and facilities including Large Community Centre Large Playing Fields with football and cricket pitches, bowling green and £25k of new play equipment. Pub Garage Farm Shop Caravan sites with further shops</p> <p>3. We note that Alburgh has been placed in Policy 9, but Wortwell is a larger village, with a better range of services and facilities and better public transport links to Harleston and Bungay. We therefore request that Wortwell also be added to Policy 9 as an 'Other Village'.</p>	
<p>7687</p>	<p>Andrew Martin Associates (Goymour Estates) Yes. Generally support policies contained within Chapter 8</p>	



7717	<p>Bidwells</p> <p>Timewell Properties Ltd objects to the Technical Consultation's emerging Policy 9: 'Other Villages'. This policy recommends a blanket planning approach to small villages in the Greater Norwich Area, irrespective of whether they are inside or outside of the Norwich Policy Area (NPA). The emerging policy seeks to limit growth in all 'Other Villages' to infill or small groups of dwellings and development of small scale businesses or services, irrespective of the settlements proximity to other jobs, services and facilities particularly in the Norwich urban fringe area.</p> <p>Timewell Properties Ltd contends that this blanket approach is overly restrictive, and does not take into account the spatial differences between those settlements within the NPA and those outside. In particular, the approach does not recognize the potential that there is for certain settlements within the NPA, such as Little Melton, to contribute to the general aspiration of achieving sustainable development. It does not reflect the good accessibility that these villages enjoy. Neither does it reflect the historic role such settlements have had in accommodating growth in the recent past.</p> <p>Timewell Properties Ltd suggest that historically, smaller villages within the NPA, particularly those with good accessibility have had an important role in delivering some of Norwich's related growth, and that this general approach should be formalised and included within the Joint Core Strategy.</p> <p>Timewell Properties Ltd therefore suggests that Policy 9 'Other Villages', should be split into two parts. Part 1 should deal with settlements within the NPA; and part 2 should deal with settlements outside of the NPA. Timewell Properties Ltd suggests that the spatial planning approach and framework should be different in each area.</p> <p>It is Timewell Properties Ltd opinion that for certain 'Other Settlements' within the NPA, including Little Melton (irrespective of whether the area is identified as a major growth location), the planning policy framework should be more flexible and accommodating of new development than the current limited/infill development approach (emerging Policy 9). Timewell Properties Ltd contends that the planning framework should be more responsive and supportive of development proposals in 'Other villages' within the NPA than those outside, and provide for growth where it can be demonstrated that it can be delivered sustainably, without undermining the achievement of environmental, economic and social objectives. Good accessibility is generally accepted as a means of contributing to sustainable development.</p> <p>Timewell Properties Ltd suggests that this approach will also help to ensure an ongoing supply of homes in the NPA, across a number of settlements and sites in advance of delivery of new homes at the major growth locations.</p> <p>Timewell Properties Ltd are not proposing a wholesale free-for-all development strategy in these 'Other Villages' in the NPA, rather that the Joint Core Strategy should adopt a carefully thought out policy of co-ordinated growth, to guide the allocation of small to medium sized</p>
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development sites in 'Other Villages' in the NPA, to be identified and allocated in the Site Allocations DPD. Timewell Properties Ltd accepts that sites would only be allocated where development achieves a good balance of delivering sustainability objectives.

Part 2 of the policy should deal with other villages outside of the NPA. Timewell Properties Ltd accepts that such an approach may not be appropriate for more remote 'Other villages' outside of the NPA.

Implications of major growth location status

Notwithstanding the above, Timewell Properties Ltd suggest that should the Hethersett and Little Melton area be identified as one of the Norwich Policy Area's major growth locations, the Joint Core Strategy's planning policy approach for Little Melton will need to reflect the settlement's new role.

Little Melton could no longer be considered as an 'Other Village' and the spatial planning framework will need to reflect the settlement's enhanced role. The Joint Core Strategy will not only need to provide clear guidance on how major growth should be accommodated in the Hethersett/Little Melton area, but will need to provide a clear policy framework for considering other development opportunities in the villages. It is Timewell Properties Ltd opinion that the identification and subsequent allocation of a major growth location, in the vicinity, further enhances the local job, services and facilities offer for Little Melton.

Evidence to support approach

There is evidence to support a more supportive approach for development in 'Other Villages in the NPA', particularly Little Melton.

Evidence of 'Other Villages' in the NPA contribution to achieving Norwich's housing growth targets. The South Norfolk Local Plan (2003) identified Little Melton and Easton as 'Settlements with good communications to the city' and allocated development there (Local Plan Policy HOU4). Similarly, the Broadland Local Plan acknowledges the role that Norwich Fringe Parishes can have in accommodating new development (Local Plan Policy GS1). The South Norfolk AMR 2006-07, shows that Easton has been consistently delivering units over the last few years with continued capacity to do so. Timewell Properties Ltd suggest that this approach should be carried forward in the Joint Core Strategy.

Evidence of 'Other Villages' in the NPA proximity to jobs, services and facilities

It is evident that given their location close to the Norwich Urban Area and its immediate environs, that the 'Other Villages' in the NPA benefit from good accessibility to jobs, services and other facilities, many of which can be reached without the need to travel by private motor car. There are bus services serving the villages. In Little Melton for example, the village has access to a range of job opportunities, services and facilities within the settlement, such as a first school, shop, village hall etc., all within walking distance. Development at Little Melton will provide the opportunity to increase the footway network in the village, and Timewell Properties Ltd's



scheme at Gibbs Close, (being promoted through the SHLAA and Site Specific Allocations DPD) will provide the missing link of footway at Mill Road, linking the centre of the village with the village hall. Little Melton also benefits from very close proximity to other jobs, services and facilities including the Norwich Research Park and University, N&N hospital. Other major employers are located within cycling distance of the village. The settlement is closer to these facilities and easier to get to than many other parts of the urban area, particularly by non-car modes.

Conclusion

Timewell Properties Ltd contend that smaller settlements close to Norwich and with good accessibility to jobs, services and facilities, such as Little Melton should have a more positive role in contributing to the delivery of houses in the NPA. These settlements provide the opportunity to deliver sustainable development, particularly in the period before the major growth locations begin delivering significant housing numbers. Timewell Properties Ltd suggests that Policy 9 should be changed, so that it provides a more positive development framework for 'Other Villages' in the NPA. The framework should provide opportunities for small to medium size sites to be allocated in those villages with good accessibility to jobs and services, within the settlement and in the Norwich Urban Fringe, such as Little Melton.

Timewell Properties Ltd suggests that the current blanket approach in emerging Policy 9, which treats all 'Other Villages' the same, irrespective of whether they are within or outside of the NPA, limits the potential for villages with good accessibility to jobs, services and facilities in and around the Norwich fringe to contribute to accommodating sustainable development. Timewell Properties Ltd accepts that a less positive framework may be appropriate for remote villages outside of the NPA.

Timewell Properties Ltd suggests that should Hethersett and the Little Melton Area be confirmed as a major growth location, the planning framework for Little Melton will need to change. The Joint Core Strategy will not only need to provide clear guidance on how major growth should be accommodated in the Hethersett and Little Melton area, but will need to provide a clear policy framework for considering other development opportunities in the villages. It is Timewell Properties Ltd opinion that the identification and subsequent allocation of a major growth location in the vicinity further enhances the local job, services and facilities offer for Little Melton.

Timewell Properties Ltd suggests that given the likely time lag between the identification of major growth locations and the actual delivery of built housing units, the Core Strategy should provide a detailed enough framework, possibly including generic criteria to allow suitable small-medium sized sites in 'Other Villages' in the NPA to come forward for development before the Site Allocations document is finalised. This would help to ensure a continual 5-year supply of suitable, available and deliverable housing development sites.

I trust the GNDP will take these comments into account in the preparation of the Core Strategy.



7749	Kimberley & Carleton Forehoe Parish Council Yes	
7780	<p>Frettenham Against Development We write on behalf of the Frettenham Against Development action group who have reviewed the full Joint Core Strategy document and we are pleased to say that we endorse the definition of Policy 9 - Other Villages.</p> <p>As stated in Policy 9, Frettenham is a village that is properly placed in the "other villages" category, in particular, that the village would not provide a sustainable location for significant development, and, that it has minimal facilities or services i.e. no shops. Indeed whilst many documents make reference to the village Post Office this is only a small facility that provides the absolute minimum services for 2 hours per week and not for all 52 weeks of the year. By definition and having previously taken soundings from the villagers they would be content with small scale mull development to meet future needs especially within the settlement boundary.</p> <p>It is felt that the village meets the criteria for both paragraph 7.30 and 7.31 on page 42 of 83 of the JCS Technical Consultation - Regulation 25, August 2008 and do not want to be the exception to the rule.</p>	
7781	<p>Geldeston Parish Council No, although this parish welcomes the premise that development in "other villages", "the countryside" (our village) and "the broads" must be limited and considered. However, a very restrictive approach to development would place these communities in a sort of suspended state, with little hope of a viable, vibrant mixed community in the future. A delicate balance needs to be struck between what is pleasing to those already living, those who visit but also to allow sufficient sensitive and discreet change to allow a village to breathe and live.</p> <p>Communities and villages in the countryside need support to ensure access to existing facilities and positive action so that they can access appropriate new facilities in order that they can thrive and develop. The Council should monitor the number of second homes in the countryside and lobby for taxation to make second homes more expensive and seasonal communities less attractive.</p> <p>Evidence in support.</p> <p>The perceived village/country life has tended to attract high income house owners who then tend to use the village/countryside only as a dormitory and do not make use of local facilities, schools, shops etc. and tend not to support local village amenities industry.</p> <p>Concerning amenities, currently there are two primary schools within 1 1/2 miles of our village, and the whole gamut of Beccles 2 miles away. We have 2 pubs, an active village hall, and an excellent village shop 1 1/2 miles away. Also a regular bus service, a mobile library, a pre-school in the next village an existing tourist amenity in the form of a boatyard and canoe hire, a children's play area, a playing field, clubs and societies and a church. However housing needs of young families on modest incomes</p>	



	<p>need to be provided to continue to support these facilities.</p> <p>At present there is willingness to use own transport and look outside "the village". There are a few people who work in the village, or from home and as the cost of transport increases there will be a greater necessity to look inside our communities for everyday living. Does the Joint Core strategy really address this forthcoming problem or is it too short sighted.</p>	
7783	<p>E A Property Further to the above process, can it please be acknowledged and further considered that Policy 8: Service Villages is objected to in so far as it does not contain the settlement of Hainford/Waterloo and that, vice-versa, Policy 9: Other Villages should not have reference to the same within.</p> <p>This is because Hainford/Waterloo substantially meets the criteria under 7.27, but also offers other benefits (ie being along a 'principle route' as well as just off the A140 itself, is well placed within the Norwich Policy Area, various employment premises, etc.) and thus would be well placed to receive a potential housing allocation of some 20-30 dwellings (which in this particular instance of the site we have an interest in, can also deliver a playing field in a suitable location to meet the location's acknowledged current deficiency as outlined in the Local Plan).</p>	
7784	<p>John Lambe Associates The statements in the Policy and in the Reasoned Justification are both welcomed and supported. That is respectively: "Farm diversification, home working, small scale commercial enterprises where a rural location can be justified, including limited leisure and tourism facilities to maintain and enhance the rural economy will also be acceptable.</p> <p>Also under:- "7.33 Development in the countryside could include:</p> <ul style="list-style-type: none"> • small scale local employment and service provision such as through farm diversification • small scale commercial enterprises where a rural location can be justified, • and limited leisure and tourism facilities to maintain and enhance the rural economy". <p>Policy 15 The economy (pages 51 & 52 of 83)</p> <p>The statements in the Policy and in the Reasoned Justification are both welcomed and supported. That is respectively:-</p> <p>"Tourism, leisure, and cultural industries will be promoted. This will be assisted by:</p> <ul style="list-style-type: none"> • the general emphasis of the Joint Core Strategy on achieving high quality design and environmental enhancement • implementation of the Green Infrastructure Strategy • encouragement for appropriate development including sustainable tourism initiatives". <p>Also under- "8.15 Tourism, leisure, and cultural industries are recognised as crucial sectors in the local economy that are also fundamental to local quality of life and the attraction and retention of other businesses and staff".</p>	



	<p>Thank you for the opportunity to make representations. It is shortly the intention to draw to your attention general areas of my client's holding for consideration at later stages, as you suggested would be appropriate - as you are already in possession of potential development sites from other parties who are participating in this process. I will therefore expect to submit further information, under my client's further instructions, when we have had an opportunity to identify these on an appropriate scale map I plan for your consideration. This being prior to you going out to public consultation on the next stage of the plan, early next year, as you advised.</p>	
7806	Long Stratton Parish Council Yes No response	
7809	<p>Landmark Planning Ltd</p> <p>I refer to the current round of consultations upon the Joint Core Strategy for the Greater Norwich area. You will be aware that I have previously made representations upon the emerging Core Strategy in February 2008. I believe you have divided the location of the representations into two areas BDC 0157 Land East of Dussindale Drive and BDC0066 Land on the West of Great Plumstead in your SHLAA framework. I would be grateful if you would go back to the original submissions, as you will see that the boundaries have been transposed incorrectly (see attached Plans). It may be that in the case of the latter you have included other lands promoted by other parties. I would be pleased to attend a meeting with you to clear up any confusion.</p> <p>BDC0157 Land East of Dussindale Drive</p> <p>The GNDP Programme of Delivery for 2008 - 2011 draws out in a number of places the appropriateness of developing this land west of the Bittern Line for housing for at least 400 houses on Brook Farm. This proposal is very closely linked with the proposed expansion of the Broadland Business Park (Regional Spatial Strategy Policy NR1), which in turn requires a Link Road through this area to the B1140 Plumstead Road East. This must be provided before the employment area can be expanded any further than current consents, as required by Policy TSA 2 of the adopted Broadland Local Plan 2006.</p> <p>It is the intention of the Lothbury Property Trust to submit a planning application in the near future for a mixed use development on their land holdings to the west of the Bittern railway line, linked through to the existing Broadland Business Park. There is clearly a need for planning permission for residential development in Broadland District (2.8 years behind RSS 14 target dwelling completions at March 2007, with only 2.58 years identified residential land supply). Last year only 280 dwellings were completed, which is less than half of the required annual completion rate of 610 dwellings per annum. This is really compromising the ability of the District to satisfy its house building targets.</p> <p>The development of this land for housing should be seen not only as part of the existing community of Dussindale but as an opportunity to remedy existing deficiencies in the area. For example, there are inadequate retail</p>	



and community facilities in the area, especially the northern part of the Dussindale, which is devoid of these. Equally, there is potential to substantially improve the variety of open space facilities in the area with sustainable links, such as walking and cycling. This is not only through new provision in this area, but also through access to the wider countryside beyond. There is also the potential to introduce a new railway station on the Bittern Line, which would also serve the existing communities in the area.

A further and important advantage of securing the Link Road with housing development is that it would remove traffic from existing unsuitable roads, such as Green Lane North and benefit existing communities, such as Thorpe End.

The development of the Brook Farm site along with an extension northwards of the Broadland Business Park would in no way compromise urban extension proposals further to the east and north. The Trust could not anyway contemplate such an approach, if it compromised the further development potential of its more substantial landholdings to the east of the railway line, as well as further development potential to the north.

In fact the development of this land with the necessary Link Road may actually facilitate such proposals, as it would improve accessibility in the area by resolving weaknesses in the existing provision for both public and private modes of transport.

BDC0066 Land to the West of Great Plumstead

The landholdings of the Lothbury Trust are in the region of 109 hectares east of the Bittern Line. There is clearly substantial public and private will for all parties to work together to improve the necessary infrastructure in the area, which would serve not only the immediate area, but also the eastern side of the Greater Norwich area. If the Rackheath Eco Town proceeds substantial additional investment in both road and rail movement will be required, which will run through this area. This infrastructure will also service this area. In the case of rail movement, for example, the Eco Town proposal would benefit from extra demand in the area and greater accessibility to a major employment facility at Broadland Business Park that a new railway station would secure. It is currently an under-utilised railway line.

The Trust's lands are adjacent to the Broadland Business Park, a key facet of the Regional Spatial Strategy 's employment policy in the Norwich area (Policy NR1). The ability to build upon the success of this employment area to create a sustainable community cannot be over emphasised. Short travel movements between homes and work places will result in the potential for higher levels of trips to be undertaken by foot, on cycle or by bus, whilst also generating less congestion through cross-city journeys on all main through roads.

The north - east of the GNDP area (assumed to be an area running from the Wroxham Road to Postwick Junction) of which the Lothbury Trust's lands form a part, is considered as very suitable for major expansion by way of an urban extension(s). The current Technical Consultation Regulation 25 supporting information promulgates three options for development, all of which include urban extensions in the north-east. The



	<p>Trust's lands also straddle the agreed route for the Norwich Northern Distributor Road. The NNDR is a significant element of the Norwich Area Transport Strategy and will play an important part in supporting major growth. Its construction is essential to the development of the Norwich Growth Point. The Trust is fully committed to working with all the appropriate public and private organisations to secure its early construction. Whilst all three options allocates at least 2,000 new dwellings in an arc around the north-east of Norwich, option 3 has an allocation of 3,000 dwellings. The incorporation of additional new dwellings through Option 3 should be viewed as a preferred option, as this will increase the good connectivity that will be created for these new residential areas through close proximity to Broadland Business Park and a range of public transport services, including a Park and Ride Facility, a new rail halt and numerous bus routes.</p> <p>The Trust is also committed to comprehensive, long-term solutions to the quality development of their land holdings. The Trust's constitution is the antithesis of those of large house builders, whose financial models require them to focus on short-term returns, with standardised products for residential accommodation only.</p> <p>In working with all the appropriate parties to secure long term sustainable development the intention would be to utilise the Enquiry by Design approach, as advocated by the Prince's Foundation. This would enable a masterplan to be generated that equitably involves all parties, including the public authorities, landowners, statutory consultees and existing communities in order to create a sustainable urban extension to the north-east of Norwich.</p> <p>The submission area is adjacent to the expanding Broadland Business Park, a key strategy of the emerging RSS 14 employment allocation (Policy NR1). The ability to build upon the success of this employment area to create a sustainable community cannot be over emphasised. Short travel movements between homes and work places will result in the potential for higher levels of trips to be undertaken by foot, on cycle or by bus, whilst also generating less congestion through cross-city journeys on all main through roads.</p>	
7832	NHS Norfolk Yes	
7835	<p>Ms Rosemary Mann</p> <p>I have read the joint core strategy and would like to make the following comments.</p> <p>Wicklewood is defined under Policy 9 - other villages and I consider that Wicklewood should be included in Policy 8 - service village.</p> <p>The village has a thriving primary school, public house, church, village hall with bowls club and playing field, a bus service into Norwich and shop premises.</p> <p>There are several small businesses in the village and unless building continues in a very positive way the facilities we do have will not thrive.</p>	



	<p>The village is on mains sewerage, not liable to flood and is only a short distance from both the A47 and A11 trunk roads.</p> <p>I consider that it is far better to expand some of the smaller villages so they have a chance of survival rather than increasing housing in places such as Wymondham which can't cope with the population it already has.</p> <p>I hope you will take my comments into consideration when finalising this document</p>	
7848	<p>Sir Philip Dowson No, the effect of the proposed policy is to effectively prevent any new housing development in the many small villages within the plan area that are not identified in Policy 9 and this will affect the sustainability of these village communities. One consequence of this policy is that the villages will slowly move "up market" as the existing houses are improved and extended making it even more difficult for local (young) people to obtain houses in these villages. The sustainability of an existing village is not the same as, and should not be confused with, sustainable locations for large scale new housing. The policy should be revised to provide for very small scale development in these small villages that allows the District Councils to prepare "tight" development boundaries for them.</p>	
7852	<p>Upton with Fishley Parish Council The councillors feel unable to comment on the vast majority of this document.</p> <p>Question 30: Upton Parish Council supports the approach to development in other villages, the countryside and the Broads. The Council welcomes the opportunity for affordable housing on exception sites, linked to local communities.</p>	
7853	<p>Woodbastwick Parish Council The councillors feel unable to comment on the vast majority of this document.</p> <p>Question 30: Woodbastwick Parish Council supports the approach to development in other villages, the countryside and the Broads. The Council welcomes the opportunity for affordable housing on exception sites, linked to local communities.</p>	



AREA WIDE POLICIES - Q31 Do you agree these policies will deliver the vision and objectives?		
	There were 48 replies to this question. Ten agree with the policies. One objects.	
	Issues mentioned include carbon emissions in Greater Norwich and the establishment of a Local Energy Company, tourism and leisure, development of small enterprises, jobs and essential services in rural communities, agreement of wide area policies with PPS12, archaeological sites, meeting future housing need, the location of future development, employment growth, Housing Corporation requirements, growth in villages other than Key Service Centres, green issues, status of Blofield, impact of Norwich Airport, "secured by design", new cricket grounds, sustainable economic development, transport, timescales and need for a "health and wellbeing" strategy. Communities mentioned include Frettenham, Norwich, Thorpe Marriot, Bowthorpe, Costessey, Longwater, Loddon, Drayton, Acle, Blofield, Brundall, Reepham, Wroxham, Reedham, Thorpe St Andrew, Cringleford, Colney, Long Stratton and Wymondham..	
6907	Greenhouse Environment/ Co-op Learning Network As alluded to above, we are very disappointed that there is no firm target being suggested for carbon emissions in Greater Norwich. One practical and innovative way to achieve this sort of pledge would be to facilitate a move towards the GNDP area becoming self-sufficient in terms of energy generation over the life of the plan. While one of the bullet points on pp.57 does allude to local and renewable energy generation, there does not seem to be a plan of how to achieve this. We would like to suggest that the GNDP authorities establish a Local Energy Company, registered as an Industrial and Provident Society for the benefit of the community. There would be 2 classes of member - individuals and organisations (such as local authorities, schools and voluntary organisations). Development of renewable and CHP infrastructure together with a local grid would be funded by a mixture of share capital subscribed by the members, bank loans, compulsory investment by developers and possibly a Community Infrastructure Levy. A formula would be devised whereby for each unit of residential housing developed, and each sq ft of office, retail or industrial space, the developer would have to subscribe to a sum of loan stock in the IPS which would be tradable and would mature at the end of the lifetime of the plant it purchased. (If this loan stock was sold on to the resident, it could be converted into share capital). This would not be a tax, but rather an investment in the development of a truly sustainable local energy system which would be self-financing over the lifetime of the infrastructure. We would be happy to work with you to commission a feasibility study into such a development.	



6917	Theatres Trust Support: We are pleased to see that tourism, leisure and cultural industries will be promoted in Policy 15. A festival or summer season will be a crucial draw and bring major economic advantage to a town but this will only be possible if suitable venues are available. A policy to promote performance spaces use as part of a relatively small development may make a strong contribution to the character of a town or location and enhance the experience of visiting the town as a tourist. We are also pleased to see the protection of existing cultural assets in Policy 18.	
6965	Woods Hardwick Planning Yes, the emphasis on developing small enterprises should be stressed as this offers the potential for high value knowledge based jobs. Many sites that would be suitable for this type of development are already available as they are underused or vacant such as the site at Frettenham, which would relieve some of the pressure to provide large scale development sites and provide expensive new infrastructure	
6974	Andrew Pym Chartered Surveyor There is no opportunity to comment on the Spatial Vision in Chapter 5 so this is addressed here to set the remaining responses in context. The last line of the first paragraph in the box in 5.4 says that "people will have good access to good quality jobs and essential services". That is certainly true in the main centres and for those who will live in the proposed new large development sites. It is not true for the many people who live in rural settlements categorised below the level of market town and the Strategy does nothing to address this. There is a clear opportunity to improve the services and accessibility of many communities by spreading development around and taking benefit for both the new and the existing residents in terms of sustaining and improving facilities in the village, improving opportunities for public transport and achieving carbon savings for both the new and existing homes and people. The focus on large developments close to the largest settlement of Norwich means that the opportunities to address the sustainability of other settlements is missed. The section on Communities, Deprivation and Regeneration identifies the benefits of improving transport to and from the countryside allowing "everyone [to] take part in community and cultural activities". It is difficult to see how this will be achieved in the life of the Strategy if the benefits are not to be achieved from development in rural communities. Similarly, in the section on Living, Working and Getting Around, it is said that "rural isolation will be reduced by improving transport networks ..." and again it is impossible to see how this will be achieved within a Strategy which focusses on the concentration of development and facilities within close reach of Norwich and a few other main centres. The opportunity to improve sustainability for existing people and properties is not addressed in the section on Service Villages and Other Villages. This needs to form a part of the Strategy. Instead, all of the Objectives focus on the integration of new development with new jobs and new services to create a more sustainable pattern of living for those areas identified for major development. The greater contribution to carbon wastage and the present unsustainability of much of the Strategy area will remain in terms of poor energy performance, reliance on carbon based fuels, and the limitations or lack of shared transport opportunities, jobs and services. The Strategy should promote policies which allow these issues are to be addressed.	



7002	Barnham Broom Parish Council Yes	
7016	Natural England Yes	
7034	Easton College A number of the Area Wide policies do not accord with the requirements of PPS12. They are largely general statements which duplicate other provision or are already covered by Government policy. As such they do not add any local dimension.	
7072	Norfolk Constabulary Housing and commercial development policy must link to "secured by design" as a planning requirement (not just a recommendation)	
7090	Hevingham Parish Council Yes	
7099	Norfolk Landscape Archaeology Several of the proposed development areas contain sites of archaeological importance. Impact of development on these sites will require mitigation in the form of preservation by record or preservation in situ.	
7103	Persimmon Homes It is considered that these sites are in an appropriate location to accommodate a substantial proportion of housing growth planned for Norwich and its hinterland as part of a sustainable urban extension to North East Norwich.	
7104	<p>Shelter (Norfolk) Shelter does not believe that the policy as it stands will meet future housing requirements in full. Shelter does not consider that Policy 14 will fully deliver Objective 4 in relation to the delivery of Affordable Housing. More particularly, there is nothing in Policy 14 which recognises the target in the Regional Spatial Strategy of 35%. Shelter considers that the as a minimum this target should be part of the Policy but further that the Policy should recognise the current identified need by setting an initial target of 45%.</p> <p>In addition, Shelter considers that Policy 14 should recognise the split between social rented and other forms of Affordable Housing. In this respect, paragraph 5.9 of the adopted Regional Spatial Strategy identifies a need for approximately 65% of Affordable Housing to be social rented, and Shelter considers that in order to deliver that part of Objective 4 that relates to Affordable Housing Policy 14 should require at least 65% of Affordable Housing to be social rented."</p>	
7149	<p>Savills A number of the proposed Area Wide policies do not accord with the requirements of PPS12. They are largely general statements which duplicate other provision or are already covered by Government policy. As such they do not add any local dimension.</p> <p>Proposed Policy 14 sets out an approach by which decisions on the quantum of affordable housing in developments will be determined by a non-statutory housing needs assessment. This is contrary to Government policy which:</p>	



	<ul style="list-style-type: none">• firstly, requires decisions on the type of housing to be provided to be based on a Strategic Housing Market Assessment (which looks the whole market), not a housing needs assessment (which traditionally only looks at the need for affordable housing); and• secondly, requires that the proportion of affordable housing sought must be set out in a Development Plan Document (Policy H2 of the East of England Plan). The proportion of affordable housing is fundamental to the viability of development and hence it must be subject to independent scrutiny through a public examination. <p>North East Norwich will be a major urban extension delivered over 15 or more years. Planning, economic and housing market issues are likely to change significantly over the period of development. As such we would wish to work with GNDP to ensure that the approach to North East Norwich delivers the best possible solutions and are bespoke to the needs the new neighbourhoods.</p>	
7155	<p>Pegasus Planning Group</p> <p>3. LOCATIONS FOR DEVELOPMENT IN THE NORWICH POLICY AREA</p> <p>3.1. The achievement of the necessary sustainable spatial strategy will arise via a combination of sites/locations, taking forward the comment at paragraph 1.10 of the Technical Consultation. We endorse the observation at paragraph 8.1 of the Consultation which states that "sustainable neighbourhoods are a key element of the Vision for this strategy to 2026." When considered in the light of this spatial background, we agree with Policy 5 of the Consultation which requires all growth locations to achieve a high level of self containment "while integrating well with neighbouring communities."</p> <p>3.2. Policy 16 of the Technical Consultation seeks to enhance the area's transportation system. Such improvements will be achieved by promoting the Norwich Northern Distributor Road "to aid strategic access, significantly improve quality of life, environmental conditions, and provide capacity for public transport improvements." Paragraph 8.18 of the Technical Consultation describes the NNDR as "a strategic element of the Norwich Area Transportation Strategy providing transport infrastructure to unlock growth and improving surface access to Norwich Airport." The proposed alignment of the NNDR passes close to the edge of Taverham/Thorpe Marriott and will fundamentally change the accessibility of the Breck Farm location. The NNDR, in certain locations, has the strategic ability to link new housing and employment areas. This is the case in the context of the enhanced linkages that would arise between Thorpe Marriott and Norwich Airport.</p> <p>3.3. The Spatial Vision, Policy 2 and Policy 4 refer to the strategic employment location at Norwich Airport and the wider significance of the NNDR. New housing provided as an extension of Thorpe Marriott would address the issues described at paragraph 7.5 of the Technical Consultation.</p> <p>3.4. Taverham/Thorpe Marriott is not specifically described as a strategic</p>	



growth location in Growth Options 1-3. However, all three Growth Options anticipate the construction of new dwellings in the northern suburbs beyond the suggested Strategic Growth Locations. Our clients agree with Growth Options 3 which anticipates the provision of 3,000 dwellings in the northern suburbs of Norwich, in Broadland District. Development arising between the edge of Thorpe Marriott/Taverham and the proposed alignment of the NNDR could accommodate some of the dwelling requirement described in Policy 5 of the Technical Consultation as forming "Broadland smaller sites."

3.5. The allocation and implementation of the proposed larger development areas will encompass a number of years. That being the case, it is important to ensure that an adequate supply of housing land is maintained in the NPA, in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the NPA, we do not consider that the housing land supply in the short/medium term can be achieved purely by means of the development of previously developed land or a reliance on a limited number of large urban extensions. A number of medium-size urban extensions, at the very edge of Norwich, should be brought forward to accommodate new housing in the short/medium term to ensure that the growth agenda for Norwich is not compromised in its initial phase.

3.6. An enlargement of Thorpe Marriott would be appropriate and achievable/deliverable in the short/medium term, thereby ensuring that the momentum for the Norwich growth area is achieved expeditiously. A planned extension of Thorpe Marriott, adjoining the proposed NNDR, could represent a key element in the early delivery of the spatial strategy for the Norwich area anticipated in the East of England Plan. The availability of land in this strategic location represents an important factor when considering the key issue of the delivery of housing in support of Policy NR1 of the East of England Plan. Its early release would be a significant building block in the early implementation of the growth agenda.

3.7. The Major Scheme Business Case prepared by Norfolk County Council in support of the Norwich Northern Distributor Route states that the NNDR "is the key piece of major infrastructure necessary to secure implementation of the agreed Norwich Area Transportation Strategy (NATS). It will also be an essential component for the successful delivery of the significant growth in jobs and housing planned for the Norwich Area in the period to 2021 and beyond." The County Council's Business Case states that development of the evidence base for the Joint Core Strategy "has confirmed the importance" of the NNDR in delivering growth. The GNDP's 'Growth Infrastructure Study' has concluded that the NNDR is needed to ensure that traffic in the northern part of the NPA can be removed from unsuitable local roads and thereby secure efficient access and movement, "including meeting the needs of planned development over the wider area."

3.8. The NNDR will provide enhanced accessibility to key employment locations in the Norwich area. The 'Greater Norwich Employment Growth and Sites and Premises Study' has confirmed the importance of Norwich International Airport to the local economy. In order to cater for employment growth, that Study has recommended a new business park



location at the airport (approximately 35 ha in extent) and an extension to the business parks at Thorpe St Andrew. The NNDR scheme is critical to the viability of the proposed enhancement of employment opportunities at the Airport.

3.9. In their Business Case, the County Council have argued that the strategic case for the NNDR "is overwhelming". At present, transport problems give rise to access constraints for businesses in the Norwich area, in particular those situated in the vicinity of Norwich International Airport. The County Council's Business Case for the NNDR notes that "Norwich International Airport is located immediately to the north of the existing urban fringe. Its links to the strategic road network to the south, west and east is via the existing congested Inner and Outer Ring Roads. The Airport contributes towards unlocking potential of the Norwich economy. Airport related industries are expanding and existing Local Plans allow for further airport related development within the curtilage of the airport. Passenger numbers are forecast to grow by 35% in the period up to 2012. The NDR will provide the strategic link necessary for the Airport and its related activities to develop to their full potential."

3.10. Thorpe Marriott is well related to the Airport at the present time and that physical relationship will be significantly enhanced with the construction of the NNDR. Given this strategic overview/relationship, our clients would contend that an expansion of Thorpe Marriott should play an important role in the short/medium term, providing new housing in close proximity to the strategic employment location at Norwich Airport to which the settlement will be linked by the NNDR.

3.11. Norfolk County Council describe the NNDR as comprising a new road "around the north and east of Norwich and significant traffic management in the city centre, plus the northern and western suburbs. The NDR is predominantly a dual carriageway road approximately 20km long. At its western end, the existing single carriageway A1067 Fakenham Road will be realigned to join Fir Covert Road at a new roundabout junction. The A1067 will then link back to Taverham along an improved Fir Covert Road. The proposed NDR will then proceed eastwards, passing to the north of Thorpe Marriott before joining the A140 Cromer Road at a new grade separated junction, close to Norwich Airport."

HOUSING

3.12. We endorse the observation at paragraph 8.4 of the Technical Consultation that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 23,200 dwellings in the NPA in the period to 2026.

3.13. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a



sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.

3.14. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change.

Appendix

Breck Farm, Thorpe Marriott
Landscape and Visual Appraisal

4. LANDSCAPE AND VISUAL DESIGN AND STRATEGY

Redevelopment Proposals

4.1 It is proposed to redevelop the 90 ha site for residential use (approximately 54 hectares capable of accommodating approximately 1500 dwellings), and associated supporting facilities and open spaces. Access to the Site is likely to be from the Northern Distributor Road. The amount of housing would be reduced if parts of the site were required for local employment opportunities or community/educational facilities.

4.2 In terms of building height and massing, it is proposed to develop the following mix:

- 3 storey residential units (at focal points etc.), up to 10.8 metres to ridge;
- 2.5 storey residential units, up to 9.8 metres to ridge;
- 2 storey residential units, up to 8.5 metres to ridge;

4.3 The concept masterplan is illustrated on Figure 6, with the aim to create a viable and attractive residential development. It has been developed in response to the landscape and visual analysis and the various different landscape and visual constraints on Site. The landscape strategy can be summarised as follows:

- Boundary Treatment/Perimeter Landscape Buffer: In consideration of the adjacent land uses and landscape planning designations, the provision of a comprehensive boundary structural landscape scheme as follows:



Western boundary

- Approximately 15 metres of structural planting in respect of a buffer adjacent to Fir Covert Road and adjacent properties, and the setting of the Special Landscape Area just further to the west;

Eastern boundary

- Approximately 20 metres of structural planting in respect of the setting of the adjacent Special Landscape Area;

Southern boundary

- No additional landscape treatment is considered necessary on the basis of the structure and function of the existing tree belts in this area;

The scale of this planting generally compares favourably with that already on the southern boundary of the Site, and would read consistently in terms of species mixes and many of the other tree planting belts in the local area. This approach would also assist in retaining the character of the adjacent Special Landscape Area as stipulated under Policy ENV8 of the Broadland Local Plan, and will ensure a suitable level of visual containment and integration into the landscape;

- Retention of Existing vegetation: The majority of existing vegetation which is currently on the Site will be retained and supplemented where possible. This includes the hedgerow infrastructure and tree planting belts. Other areas of more informal planting may be retained amongst the open space network. Application of a series of landscape maintenance and management regimes will also serve to ensure the long-term future of this vegetation is maximised;

- Primary pedestrian/cycle link: retention of Breck Farm Lane as a pedestrian/link through the Site, linking the urban area to the south and the open countryside to the north;

- Provision of Open Space: open space will be provided across the site, distributed evenly throughout the housing cells to ensure ease of access. The retention of Marriott's Way within a landscape setting will provide a linear open space, breaking down the Site into two overall parts. Other areas of open space will run perpendicularly to this axis into the eastern and western parts of the Site, and where the two elements of open space cross, a larger central parkland space will be created. As well as providing usable space for residents and amenity value, in combination with the perimeter structural landscape, it will assist in providing both a greater variety of landscape resources across the Site, and their associated biodiversity value;

- Central Core: Located adjacent to the central park and on the axis of the primary pedestrian cycle link, a core area comprising community facilities, in a hard and soft landscape setting with clear and precise design qualities, including elements such as an open square, more formal tree planting and informal play areas

- Northern boundary: creation of a well landscaped corridor along the axis of the proposed Northern Distributor Road, to both visually contain the route and create a well defined 'edge of settlement'. Tree belt planting to 30 metres wide will assist in acoustic as well as visual containment. No



	<p>development is proposed north of this alignment, and the open space to the north will be accessed via the main pedestrian/cycle link along Breck Farm Lane;</p> <ul style="list-style-type: none"> • Amenity Planting: In addition to the public open space, numerous green infrastructure links will be created across the development, along access roads and in garden spaces to provide a pleasant local setting for the new development, and ensure that a balance is struck across the Site in terms of planting; and • Species Mixes: Species planted will be similar to those existing on the Site at present, based on native indigenous species to assist in assimilating the development in the surrounding area on a more detailed level. 	
<p>7160</p>	<p>Pegasus Planning Group</p> <p>5.1. We endorse the observation at paragraph 8.4 of the Technical Consultation that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 25,420 dwellings in Broadland, Norwich and South Norfolk in the period to 2026.</p> <p>5.2. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.</p> <p>5.3. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change and the wider Broadland/Norwich/South Norfolk area.</p>	



7162	Taylor Wimpey 3. LOCATIONS FOR DEVELOPMENT IN THE NORWICH POLICY AREA 3.1. The achievement of the necessary sustainable spatial strategy will arise via a combination of sites/locations, taking forward the comment at paragraph 1.10 of the Technical Consultation. We endorse the observation at paragraph 8.1 of the Consultation which states that "sustainable neighbourhoods are a key element of the Vision for this strategy to 2026." When considered in the light of this spatial background, we agree with Policy 5 of the Consultation which requires all growth locations to achieve a high level of self containment "while integrating well with neighbouring communities." 3.2. Taylor Wimpey Developments and Hopkins Homes acknowledge that the GNDP has not yet decided how the development required by the East of England Plan can best be accommodated/ distributed in the Norwich Policy Area. At this stage in the process, we would suggest that Growth options 1 and 2 provide the most appropriate/sustainable strategy to address the growth requirements for the NPA established in the EEP. 3.3. The Spatial Vision, Policy 2 and Policy 4 refer to the strategic employment location at Longwater and the anticipated significant enhancement of public transport between the City Centre and Bowthorpe/Costessey/Longwater. Given those important elements of the emerging strategy, we consider that Options 1 and 2 would secure a distribution of new housing which reflects the spread of strategic employment areas described in Policy NR1 of the East of England Plan and the transportation enhancements foreshadowed in Policy 4 of the present Consultation. Furthermore, development in accordance with Options 1 and 2 would provide the opportunity to secure enhanced gateways to Norwich as required by Policy 4 of the Technical Consultation. Options 1 and 2 of the Technical Consultation will certainly deliver new housing and other objectives of strategic significance to the NPA. 3.4. We have noted that Appendix one suggests that Growth option 1 requires an increase in capacity at the A47 Longwater junction. The GNDP will be aware of the fact that an improved junction layout in this general area will be achieved by the utilisation of part of the proposed Lodge Farm extension. 3.5. We have noted that the indicative diagram describing Growth option 3 restricts development to an area to the west of the A47/Longwater junction. Our clients object strongly to this proposition and contend that the proposed extension of the existing Lodge Farm development area represents the most appropriate response to development in the West Sector as it represents clearly a development form arising at the edge of the existing built-up area of Norwich. Option 3 would appear to propose a significant expansion of Easton rather than the more appropriate/sustainable strategy advanced in Growth options 1 and 2 which anticipate development arising at the edge of the built-up area of Norwich. Whilst the text regarding Growth option 3 refers to around 1,000 dwellings at Costessey and Easton, the plan illustrating Growth option 3	
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makes it clear that the development is expected to arise only at Easton. Given the wider aspirations for the Norwich Policy Area, we would contend that the approach for the West Sector described in Growth options 1 and 2 is more sustainable.

3.6. Questions 3-12 at page 34 of the Technical Consultation refer to issues in connection with Growth options 1 and 2. Given that land at the western edge of the existing Lodge Farm development area is included within both potential strategies, our clients' comments relate to both elements as described within Policy 5. Given the strategy for the Norwich area established in the East of England Plan, the Joint Core Strategy should acknowledge that the key issue is the delivery of new housing in response to the identification of Norwich in Policy SS3 of the EEP as a Key Centre for Development and Change.

3.7. The allocation and implementation of the proposed larger development areas will encompass a number of years. That being the case, it is important to ensure that an adequate supply of housing land is maintained in the NPA, in accordance with the principles established in PPS3. Given the amount of new housing to be provided in the NPA, we do not consider that the housing land supply in the short/medium term can be achieved purely by means of the development of previously developed land or a reliance on a limited number of large urban extensions. A number of medium-size urban extensions, at the very edge of Norwich, should be brought forward to accommodate new housing in the short/medium term to ensure that the growth agenda for Norwich is not compromised in its initial phase.

3.8. The GNDDP will be aware of the fact that our clients are presently implementing development at Lodge Farm on the edge of Norwich/Costessey. We consider that the extension of that site to the west would address the strategic spatial objectives in the Technical Consultation and provide an opportunity for new housing to be constructed in the short term. Our clients are already at present on site and an expansion of the existing area could readily be achieved once the appropriate planning permissions have been secured.

3.9. An enlargement of the existing Lodge Farm development area would be appropriate and achievable/deliverable in the short/medium term, thereby ensuring that the momentum for the Norwich growth area is achieved expeditiously. A planned extension of the Lodge Farm site represents a key element in the early delivery of the spatial strategy for the Norwich area anticipated in the East of England Plan. The availability of land at Lodge Farm under the control of our clients represents an important factor when considering the key issue of the delivery of housing in support of Policy NR1 of the East of England Plan. Its early release would be a significant building block in the early implementation of the growth agenda.

West Sector: Costessey

3.10. The strategic significance of Costessey was discussed during the course of the South Norfolk Local Plan Inquiry. When considering the Norwich Policy Area, the Inspector was of the view that the bulk of the new housing provision should be in locations on the edge of Norwich and



in settlements with good communication links to the City. He indicated that he regarded Costessey as being in the highest category of housing location available within the Norwich Policy Area:

"In my overview of the settlement and other introductory paragraphs to Section 28 of Part 2 of this Report, I place Costessey in the highest category of housing location available to the District Council within the Norwich Area. Moreover, the objection land lies directly alongside one of the main radial routes into the City Centre, and midway between the major development areas of Bowthorpe and Longwater, so both large scale employment opportunities and retail facilities are close at hand."

3.11. Those comments were made in the context of the Inspector's assessment of the acceptability of new housing now allocated by virtue of Policy COS2 of the South Norfolk Local Plan. The Inspector's broad conclusions regarding the sustainability credentials of Costessey are equally valid in the context of the JCS and, accordingly, we would suggest that further housing could be provided on the north-western approach to Norwich.

3.12. Strategic Principle 3 of the South Norfolk Local Plan recognises that a major element of growth in the NPA is to be accommodated in the South Norfolk component of the NPA. In these circumstances, subject to environmental and infrastructure conditions, development is accordingly to be directed to locations selected because they will minimise the need for travel, and which have good access by public transport, cycling and walking. In broad terms, Costessey exhibits the necessary locational attributes that would suggest that it is capable of accommodating further growth to respond to the content of the draft EEP.

3.13. The SNLP acknowledges that Old Costessey and New Costessey offer a wide range of social and community facilities. Direct access to Norwich City Centre is provided along the A1074 Dereham Road whilst good access to the southern edge of the City is provided by the A47 Norwich Southern Bypass. It is noted that the settlement "is strategically very well placed as a location for new development". Furthermore, when considering the Lodge Farm housing land allocation, the SNLP notes that that allocation is proposed "in recognition of Costessey's status as one of the District's prime sustainable locations for new housing."

3.14. We would note that the critical mass of population that could be achieved by way of the existing housing land allocations in Costessey (Lodge Farm and land north of the River Tud) and the provision of further housing at Lodge Farm could provide the opportunity to secure a quality public transport link along Dereham Road to Norwich city centre.

An extension to Lodge Farm: technical aspects

3.15. Dereham Road represents a public transport corridor into the centre of Norwich with a park and ride site in the vicinity of the junction between the A47 and Dereham Road. An extension of the existing Lodge Farm development area would make appropriate use of this existing facility and provide an opportunity to enhance its value. More bus priority can be promoted on this key radial route whilst equally recognising the need to ensure capacity is available for movement by private car.



3.16. New housing to the west of the present Lodge Farm development area would not require additional significant infrastructure to support its implementation. Our suggested extension of the present Lodge Farm development would not have a significant impact upon the operation of the junction between Dereham Road and the A47. Access arrangements for a potential enlargement of the Lodge Farm site could incorporate a roundabout located on Dereham Road, to the west of the existing access to the Lodge Farm buildings, in order to provide sufficient and satisfactory access to the land concerned. In addition, the section of carriageway between that roundabout and the A47 junction could be constructed to dual carriageway standard, thereby providing sufficient stacking space for queuing vehicles on the approach to the grade separated junction. Furthermore, if necessary, a left turn filter onto the A47 southbound could be provided within the Lodge Farm extension area.

3.17. An extension of the existing Lodge Farm development area would appear to be anticipated in both Growth options 1 and 2. The plans at pages 68 and 72 of the Technical Consultation suggest development arising between the A47 and the edge of the existing built-up area of Norwich. Lodge Farm is situated within that general area. Thus, our clients' land can play an important and significant role in the early implementation of housing to support the growth agenda for the Norwich Policy Area. In response to Questions 5 and 10, we would note that the Lodge Farm extension forms a fundamental component of Growth options 1 and 2 as it represents a sustainable extension of an existing development area and can, accordingly, be delivered early in the process.

3.18. The implementation of the suggested Lodge Farm extension will plainly be well related to our clients' longer term investment strategies and both Taylor Wimpey Developments Ltd and Hopkins Homes are committed to supporting growth in the West Sector on the basis of the broad distribution of growth shown on the plans to be found at pages 68 and 72 of the Technical Consultation. However, our clients are unable to commit to support Growth option 3 as the plan at page 76 of the Technical Consultation suggests to them that this particular approach would not involve land between the A47 and the existing built-up area of Norwich/Costessey. Growth option 3 would appear to rule out the possibility of a sustainable urban extension at Lodge Farm and, accordingly, our clients are unable to support Growth option 3 and the manner in which it assumes development will arise in the West Sector.

4. HOUSING

4.1. We endorse the observation at paragraph 8.4 of the Technical Consultation that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 23,200 dwellings in the NPA in the period to 2026.

4.2. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward



	<p>pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.</p> <p>4.3. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change.</p>	
<p>7192</p>	<p>Savills A number of the Area Wide policies do not accord with the requirements of PPS12. They are largely general statements which duplicate other provision or are already covered by Government policy. As such they do not add any local dimension.</p> <p>Policy 15 is not consistent with the Spatial Vision nor the timescale for the Core Strategy. The first bullet refers to job growth for the period 2001 - 2021. This should be amended to be consistent with the Spatial Vision target of 33,000 jobs over the period 2006 - 2026.</p> <p>We welcome the fourth bullet point of Policy 15 which recognises the need to provide for sufficient land throughout the plan period. As set out in response to Q4, 9 & 14, we consider that the Core Strategy does not achieve this objective and that the strategic locations proposed will not be available in the short term and hence Core Strategy will not address the current, acknowledged shortage of land for employment development.</p>	
<p>7205</p>	<p>Persimmon Homes In relation to Policy 13, it is unreasonable to require all new housing to match current Housing Corporation requirements under the Code for Sustainable Homes. The house building industry is committed to working in stages towards the government's aspiration to achieve zero carbon new dwellings by 2016. However the relevant technologies to achieve this are still developing and also there may be circumstances where achieving specific levels or ratings under the Code may not be feasible or viable for unsubsidised open market housing, particularly whilst achieving other objectives, such as providing affordable housing or meeting infrastructure requirements. A more flexible policy wording is needed that promotes more sustainable construction and carbon reduction measures rather than requiring certain levels or ratings. This would also be more adaptable to changing technologies and any future changes in government policy.</p>	



<p>7229</p>	<p>Bidwells Drayton Farms Ltd has a number of comments to make on this Study by Ove Arup and Partners Limited. Paragraph 1.16 recommends that an additional 250 hectares of employment land will be required by 2026, comprising 126 hectares of 81 office land and 124 hectares of 82/88 general industrial/distribution land, and paragraph 2.4.5 of the Executive Summary recognises that there are areas of the Norwich Policy Area where economic and employment development can help to achieve improvements in both sustainability and social deprivation.</p> <p>Of critical importance a constant theme within the Study is the need to ensure that the communities of Norwich are able to engage and benefit from future employment growth. At paragraph 3.10.3 the Study recognises that Norwich has surprisingly high levels of deprivation spread throughout the urban area, but concludes that residents in the north of the city have been facing an increasing decline in employment opportunities. As such the Study recommends the need to strongly promote the development of new opportunities in the north. Drayton Farms Ltd. contends that this site could therefore provide employment opportunities not only for new communities but also existing communities in the north city.</p> <p>Paragraph 14.2 finds that construction is likely to be a major growth area during the Plan period, with an employment increase of 3200 predicted to deliver housing and infrastructure growth. As a subsidiary of RG Carter Ltd, Norfolk's leading construction company, Drayton Farms Ltd is keen to release land close to RG Carter's Drayton headquarters which could help contribute to this growth in the construction industry and possibly help develop a construction 'hub'.</p> <p>Paragraph 23.5.2 identifies Norwich Airport as a "major opportunity site" for employment growth, particularly (but not exclusively) for aviation, renewable energy and gas extraction in the North Sea.</p> <p>Paragraph 23.5.1 finds that the main weakness of employment land in the northern part of Norwich is the limited availability of ready-to-use sites, particularly for those seeking larger or bespoke premises, although there is also a shortage of smaller industrial units.</p> <p>In this context, Drayton Farms Ltd believes that its land off Reepham Road/School Road is ideally located to assist in the provision of further employment land in the northern part of the Norwich Policy Area. At approximately 21 hectares in size, it would be able to provide a range of sizes and types of sites, with 81, 82 and 88 uses all possibilities. Whilst the site would still be viable and deliverable even in the absence of the Northern Distributor Road, if the NDR goes ahead the site would be very close to the proposed Drayton Lane and Reepham Road junctions, with easy access to the proposed A140 grade-separated junction.</p>	
<p>7244</p>	<p>Mr Richard Atkinson Yes, though the key diagrams in the appendices are not clear enough with regard to the location of strategic growth within adjacent to the main urban area. There is significant potential for employment development on land to the north of the airport, both inside</p>	



	and outside the route of the Northern Distributor Road and this should be reflected in the JCS.	
7247	<p>RPS In relation to Policy 13, it is unreasonable to require all new housing to match current Housing Corporation requirements under the Code for Sustainable Homes. The house building industry is committed to working in stages towards the government's aspiration to achieve zero carbon new dwellings by 2016. However the relevant technologies to achieve this are still developing and also there may be circumstances where achieving specific levels or ratings under the Code may not be feasible or viable for unsubsidised open market housing, particularly whilst achieving other objectives, such as providing affordable housing or meeting infrastructure requirements. A more flexible policy wording is needed that promotes more sustainable construction and carbon reduction measures rather than requiring certain levels or ratings. This would also be more adaptable to changing technologies and any future changes in government policy</p>	
7265	<p>Barton Willmore Policy 13 - Reducing Environmental Impact, sufficiently addresses climate change and promotes sustainability in all development. The policy is in line with central government guidance and all has to meet Code for Sustainable Homes targets.</p> <p>1.18 Policy 14 - Housing Delivery states that provision will be made for at least 40,000 new homes between 2006 and 2026 within the NPA. This figure stems from the Regional Spatial Strategy (RSS) for the East of England. Proposals for housing will be expected to contribute to the mix of housing required to meet the needs of the area, This is of course dependent on up to date and accurate Housing Market Assessments.</p> <p>1.19 In negotiating the proportion and tenure of affordable housing, account must be made of site characteristics, market conditions, the overall viability of the scheme and availability of Housing Association Funding. For this reason the level of affordable housing provision sought for any individual scheme must be considered on a site by site basis including the findings of the Housing Needs Survey.</p> <p>1.20 Policy 15 - The Economy states that the local economy will be developed in a sustainable way to facilitate the proposed RSS job growth. Phillip Jeans Homes agree that achieving the full economic potential of the area is dependent on improved connectivity and implementation of wider sustainable transport proposals.</p> <p>1.21 Policy 16 - Strategic Access and Transportation states that an enhanced transport system will be provided to promote sustainable economic transport and reduce the contribution to climate change, promote healthy travel choices and minimise the need to use the private car.</p> <p>1.22 Phillip Jeans Homes wholly support this strategy and consider that development on their site at George Lane, Loddon would be wholly sustainable being in close proximity to existing public transport provision and within easy walking distance to a number of key services and facilities.</p>	



	<p>1.23 Policy 17 - Environmental Assets states that environmental assets of the area will be protected, maintained and enhanced and the benefits for residents and visitors improved. Development proposals should avoid harming areas of environmental importance. Phillip Jeans Homes support the view of the GNDDP that responsible planning is required to ensure that existing environmental assets are not harmed. For this reason any proposed development should demonstrate that the development would not harm the environment as a whole, including ecology and landscape. Phillip Jeans Homecare extremely confident that they can demonstrate through analysis of the George Lane site that residential development on the land would not jeopardise ecology or landscape.</p> <p>1.24 Policy 1.8 - Communities and Culture states that in order to deliver thriving communities, tackle social deprivation and meets the diverse needs across the Joint Core Strategy area; a spatial planning approach will be required to ensure infrastructure requirements are addressed in a holistic way. Phillip Jeans Homes fully support the principle of social inclusion and believe that they can demonstrate that their proposals for the George Lane site in Loddon will be built to accommodate the needs of the village community. Affordable housing provision and appropriate contributions to community facilities within the legal parameters of a Section 106 Agreement will ensure that development of the site represents a development for all.</p>	
7292	<p>Bidwells Drayton Farms Ltd has a number of comments to make on this Study by Ove Arup and Partners Limited. Paragraph 1.16 recommends that an additional 250 hectares of employment land will be required by 2026, comprising 126 hectares of 81 office land and 124 hectares of 82/88 general industrial/distribution land, and paragraph 2.4.5 of the Executive Summary recognises that there are areas of the Norwich Policy Area where economic and employment development can help to achieve improvements in both sustainability and social deprivation.</p> <p>Of critical importance a constant theme within the Study is the need to ensure that the communities of Norwich are able to engage and benefit from future employment growth. At paragraph 3.10.3 the Study recognises that Norwich has surprisingly high levels of deprivation spread throughout the urban area, but concludes that residents in the north of the city have been facing an increasing decline in employment opportunities. As such the Study recommends the need to strongly promote the development of new opportunities in the north. Drayton Farms Ltd. contends that this site could therefore provide employment opportunities not only for new communities but also existing communities in the north city.</p> <p>Paragraph 14.2 finds that construction is likely to be a major growth area during the Plan period, with an employment increase of 3200 predicted to deliver housing and infrastructure growth. As a subsidiary of RG Carter Ltd, Norfolk's leading construction company, Drayton Farms Ltd is keen to release land close to RG Carter's Drayton headquarters which could help contribute to this growth in the construction industry and possibly help develop a construction 'hub'.</p>	



	<p>Paragraph 23.5.2 identifies Norwich Airport as a "major opportunity site" for employment growth, particularly (but not exclusively) for aviation, renewable energy and gas extraction in the North Sea.</p> <p>Paragraph 23.5.1 finds that the main weakness of employment land in the northern part of Norwich is the limited availability of ready-to-use sites, particularly for those seeking larger or bespoke premises, although there is also a shortage of smaller industrial units.</p> <p>In this context, Drayton Farms Ltd believes that its land off Reepham Road/School Road is ideally located to assist in the provision of further employment land in the northern part of the Norwich Policy Area. At approximately 21 hectares in size, it would be able to provide a range of sizes and types of sites, with 81, 82 and 88 uses all possibilities. Whilst the site would still be viable and deliverable even in the absence of the Northern Distributor Road, if the NDR goes ahead the site would be very close to the proposed Drayton Lane and Reepham Road junctions, with easy access to the proposed A140 grade-separated junction.</p>	
7244	<p>Mr Richard Atkinson Yes, though the key diagrams in the appendices are not clear enough with regard to the location of strategic growth within / adjacent to the main urban area. There is significant potential for employment development on land to the north of the airport, both inside and outside the route of the Northern Distributor Road and this should be reflected in the JCS.</p>	
7247	<p>RPS In relation to Policy 13, it is unreasonable to require all new housing to match current Housing Corporation requirements under the Code for Sustainable Homes. The house building industry is committed to working in stages towards the government's aspiration to achieve zero carbon new dwellings by 2016. However the relevant technologies to achieve this are still developing and also there may be circumstances where achieving specific levels or ratings under the Code may not be feasible or viable for unsubsidised open market housing, particularly whilst achieving other objectives, such as providing affordable housing or meeting infrastructure requirements. A more flexible policy wording is needed that promotes more sustainable construction and carbon reduction measures rather than requiring certain levels or ratings. This would also be more adaptable to changing technologies and any future changes in government policy</p>	
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dependent on up to date and accurate Housing Market Assessments.

1.19 In negotiating the proportion and tenure of affordable housing, account must be made of site characteristics, market conditions, the overall viability of the scheme and availability of Housing Association Funding. For this reason the level of affordable housing provision sought for any individual scheme must be considered on a site by site basis including the findings of the Housing Needs Survey.

1.20 Policy 15 - The Economy states that the local economy will be developed in a sustainable way to facilitate the proposed RSS job growth. Phillip Jeans Homes agree that achieving the full economic potential of the area is dependent on improved connectivity and implementation of wider sustainable transport proposals.

1.21 Policy 16 - Strategic Access and Transportation states that an enhanced transport system will be provided to promote sustainable economic transport and reduce the contribution to climate change, promote healthy travel choices and minimise the need to use the private car.

1.22 Phillip Jeans Homes wholly support this strategy and consider that development on their site at George Lane, Loddon would be wholly sustainable being in close proximity to existing public transport provision and within easy walking distance to a number of key services and facilities.

1.23 Policy 17 - Environmental Assets states that environmental assets of the area will be protected, maintained and enhanced and the benefits for residents and visitors improved. Development proposals should avoid harming areas of environmental importance. Phillip Jeans Homes support the view of the GNDP that responsible planning is required to ensure that existing environmental assets are not harmed. For this reason any proposed development should demonstrate that the development would not harm the environment as a whole, including ecology and landscape. Phillip Jeans Homecare extremely confident that they can demonstrate through analysis of the George Lane site that residential development on the land would not jeopardise ecology or landscape.

1.24 Policy 1.8 - Communities and Culture states that in order to deliver thriving communities, tackle social deprivation and meets the diverse needs across the Joint Core Strategy area; a spatial planning approach will be required to ensure infrastructure requirements are addressed in a holistic way. Phillip Jeans Homes fully support the principle of social inclusion and believe that they can demonstrate that their proposals for the George Lane site in Loddon will be built to accommodate the needs of the village community. Affordable housing provision and appropriate contributions to community facilities within the legal parameters of a Section 106 Agreement will ensure that development of the site



	represents a development for all.	
7292	<p>Bidwells Drayton Farms Ltd has a number of comments to make on this Study by Ove Arup and Partners Limited. Paragraph 1.16 recommends that an additional 250 hectares of employment land will be required by 2026, comprising 126 hectares of 81 office land and 124 hectares of 82/88 general industrial/distribution land, and paragraph 2.4.5 of the Executive Summary recognises that there are areas of the Norwich Policy Area where economic and employment development can help to achieve improvements in both sustainability and social deprivation.</p> <p>Of critical importance a constant theme within the Study is the need to ensure that the communities of Norwich are able to engage and benefit from future employment growth. At paragraph 3.10.3 the Study recognises that Norwich has surprisingly high levels of deprivation spread throughout the urban area, but concludes that residents in the north of the city have been facing an increasing decline in employment opportunities. As such the Study recommends the need to strongly promote the development of new opportunities in the north. Drayton Farms Ltd. contends that this site could therefore provide employment opportunities not only for new communities but also existing communities in the north city.</p> <p>Paragraph 14.2 finds that construction is likely to be a major growth area during the Plan period, with an employment increase of 3200 predicted to deliver housing and infrastructure growth. As a subsidiary of RG Carter Ltd, Norfolk's leading construction company, Drayton Farms Ltd is keen to release land close to RG Carter's Drayton headquarters which could help contribute to this growth in the construction industry and possibly help develop a construction 'hub'.</p> <p>Paragraph 23.5.2 identifies Norwich Airport as a "major opportunity site" for employment growth, particularly (but not exclusively) for aviation, renewable energy and gas extraction in the North Sea.</p> <p>Paragraph 23.5.1 finds that the main weakness of employment land in the northern part of Norwich is the limited availability of ready-to-use sites, particularly for those seeking larger or bespoke premises, although there is also a shortage of smaller industrial units.</p> <p>In this context, Drayton Farms Ltd believes that its land off Reepham Road/ School Road is ideally located to assist in the provision of further employment land in the northern part of the Norwich Policy Area. At approximately 21 hectares in size, it would be able to provide a range of sizes and types of sites, with 81, 82 and 88 uses all possibilities. Whilst the site would still be viable and deliverable even in the absence of the Northern Distributor Road, if the NDR goes ahead the site would be very close to the proposed Drayton Lane and Reepham Road junctions, with easy access to the proposed A140 grade-separated junction.</p>	



7337	<p>Chris Mutten</p> <p>POLICY 14 - HOUSING DELIVERY</p> <p>3.1 According to this policy provision needs to be made for at least 40,000 new homes between 2006 and 2026. Of these 36,000 will be in the Norwich Policy Area. This still leaves 4,000 homes to be found outside the NPA. According to the Table at paragraph 8.4 of the consultation document 1,130 homes need to be allocated in the Broadland Rural area.</p> <p>3.2 Even with the development proposed at Acle, Blofield, Brundall, Reepham and Wroxham there will still be a need to allocate some residential development elsewhere in Broadland District to meet the above target. Consequently, with the level of services available in Reedham, there should be further allocation of development at Reedham beyond 20 dwellings set out in Policy 8. Our client's land at Reedham is ideally suited for residential development as there are no constraints which need to be overcome and the site could be developed immediately.</p> <p>3.3 A mix of housing could be developed on our client's site to meet specific local housing need as envisaged by this policy.</p> <p>4.0 POLICY 15 - THE ECONOMY</p> <p>4.1 Policy E1 of the East of England Plan states that Norwich, Broadland and South Norfolk should provide 35,000 jobs within the period 2001-2021. The previous version of the Joint Core Strategy contained a section which dealt with employment matters and set out a number of options for small scale employment growth. These were:</p> <p>"(a) requiring all new larger housing developments to include employment uses and/or encouraging a flexible approach to residential units such as specific live/work units; (b) ensuring smaller employment sites are available, particularly to support smaller businesses and start-ups in identified settlements or, for example, through conversion of rural buildings; (c) ensuring there is adequate provision for managed workspace, "growing on" units and low cost areas for more marginal businesses across the city and the wider area."</p> <p>4.2 However, this current consultation does not give any support to the rural economy beyond stating:</p> <p>"...In the rural areas the economy and diversification will also be supported by</p> <ul style="list-style-type: none">• A preference for the re-use of appropriate redundant agricultural buildings for commercial uses, including holiday homes to support the tourism industry (affordable housing may be an acceptable alternative use).• Promotion of farmers markets and farm shops in villages." <p>4.3 From the above it seems that there has been a removal of the Councils' acknowledgement that appropriate scale employment</p>	
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	<p>opportunities should be encouraged across the rural area to serve local needs (Question 24 of the previous consultation refers). It is crucial that smaller villages such as Reedham benefit from further employment development and it would help to achieve a greater balance between homes and jobs which would also reduce the need to travel.</p> <p>4.4 The rural economy is supported by national policy set out in PPS7: "Sustainable Development in Rural Areas". Paragraph 4 of this document states that:</p> <p>"Planning authorities should set out in LDD's their policies for allowing some limited development in, or next to, rural settlements that are not designated as local service centres, in order to meet local business and community needs and to maintain the vitality of these communities.."</p> <p>4.5 In light of this national advice we would support a policy which would specifically allow for small-scale growth in villages other than key service centres.</p>	
7353	Mr Jim Hamshaw Yes	
7391	I E Homes and Property Ltd yes	
7451	<p>Environment Agency (Eastern Area Office)</p> <p>We recommend that the first sentence of policy 13 be amended to include the text highlighted in blue "...all development will be energy and water efficient...". We suggest this amendment as water efficiency is part of the Government's strategy to adapt to and prevent, indirectly, climate change. Water efficiency is part of the CfSH, which is also cited within this policy.</p> <p>We also suggest that the second bullet point following the statement "all development will..." includes the requirement to enhance biodiversity and landscape character as well as protect them.</p> <p>Under the third bullet point we again suggest that water efficiency be included with energy efficiency.</p> <p>Under the sixth bullet point we suggest that the sentence be amended to include the text highlighted in blue "mitigating any flood risk through design and use of Sustainable Drainage Systems (SuDS)".</p> <p>We note that this policy does not include any reference to waste management. Since this is a key consideration in reducing environmental impact we recommend that this be included as a new bullet point.</p> <p>We support Par 8.1 and Par 8.2, but it should be kept in mind that there are some effects of climate change that you may not be able to wholly mitigate for or prevent at a local level. An example of this would be water resources, which will increasingly rely upon transfers from other regions of the country. Therefore whilst opportunities to minimise the impact of</p>	



	<p>new and existing development on climate change should be sought, e.g. through a local energy plan, the JCS should also steer the LDF to adapting communities to using less resources or, where appropriate, reusing those they already have.</p> <p>Policy 16 states that the Norwich Northern Distributor Route (NNDR) would "...significantly improve quality of life, environmental conditions and provide capacity for public transport improvements". We assume that the environmental conditions considered relate primarily to human-centered conditions, rather than wider environmental considerations. We suggest that this be more clearly stated within the policy as the current wording could be misread to include all environmental conditions.</p> <p>We recommend that the first bullet point of policy 17 removes reference to 'maintenance' and instead states only "...long-term enhancement of the status quo". This change would provide a stronger steer to the LDF for protection and enhancement of environmental assets where a designation has not already been granted. Such a change would also more closely link with the second bullet point where opportunities exist to provide an overall improvement to an area's landscape, ecological and historic character.</p>	
7485	Hethersett Parish Council In principle and generally yes	
7496	Ingleton Wood yes	
7524	<p>King Sturge</p> <p>This question concerns area wide policies such as affordable housing. King Sturge believes that a 'one size fits all' approach is too imprecise a tool given the significant variations across the three Councils. Indeed, King Sturge believes that many of the policies (such as affordable housing) should be determined on a site by site basis, given that the conditions in Metropolitan Norwich are substantially different to Rural Broadland.</p> <p>This will allow both the Council and local developers flexibility to bring forward housing sites; tailoring both the number and mix to local housing needs and viability. Reliance upon too prescriptive an approach may dissuade developers from bringing land forward, reducing the number of houses built (thereby reducing the amount of affordable housing delivered).</p> <p>In summary, King Sturge agrees with the main principles of the document. Namely, that the majority of growth should be directed towards the Norwich Policy Area, which encompasses Blofield. Furthermore, it is welcomed that Blofield is recognised as a Key Service Centre, and that provision should be made of additional housing development at the settlement. However, recognition should also be given to the need to make a minor amendment to the settlement boundary at Garden Farm to enable appropriate and suitable development to come forward.</p> <p>Notwithstanding this, the level of housing growth anticipated at Blofield</p>	



	<p>should be increased in line with other Key Service Centres.</p> <p>An allocation of 100-200 dwellings will allow a development to come forward which can yield better community infrastructure than a number of small minor allocations, which are unlikely to be above thresholds to deliver such gain.</p> <p>Furthermore, the scale of growth anticipated in the Norwich Policy Area means that it would be robust to allocate a commensurate amount of housing at Blofield as other Key Service Centres to ensure development is realistically delivered during the lifetime of the LDF. Garden Farm is a readily deliverable site.</p> <p>In the context of the questions proposed, the planned infrastructure (such as the Northern Norwich Distributor Route) are strongly supported. Option 3 of the three development strategies posed is the most strongly supported, as additional development is directed towards settlements in Broadland. Blofield, as a Key Service Centre with available housing land, and an absence of recent housing development; is a suitable location to accommodate the increased growth. This will help consolidate the settlement, increasing the vitality and viability of existing community facilities and services, and help local inhabitants remain in the area.</p>	
7525	<p>King Sturge On behalf of Mr Michael Andrews, the landowner of Garden Farm, Blofield, King Sturge are instructed to make representations to the above document. In accordance with the Greater Norwich Development Partnership's favoured approach, the representations adhere to the question format laid out in the consultation paper.</p> <p>Notwithstanding this, it is worth stating that King Sturge agrees with the main principles of the document. Namely, that the majority of growth should be directed towards the Norwich Policy Area which encompasses Blofield. Furthermore, that the document recognises Blofield as a Key Service Centre, and that provision should be made of additional housing development at the settlement. However, the scale of this growth should be increased in line with other Key Service Centres.</p>	
7527	<p>National Trust</p> <p>The National Trust is concerned to ensure that visitors' enjoyment of Trust landholdings and properties will not be significantly harmed by increasing disturbance caused by aircraft noise.</p> <p>Policy 16 aims to enhance the transportation system to promote sustainable economic development, reduce the contribution to climate change, promote healthy travel choices and minimise the need to use the private car. These aims are supported.</p> <p>However, in this context it is difficult to see how unqualified support for promoting the regional significance of Norwich International Airport for both leisure and business travel to destinations across the UK and beyond can be justified. What level of expansion is supported? What are</p>	



	the environmental impacts? This issue should be considered in more detail. It does not appear to have been addressed in the sustainability appraisal.	
7569	<p>Norfolk Constabulary Area Wide Policies</p> <p>Housing and commercial development policy must link to "secured by design" as a planning requirement (not just a recommendation).</p>	
7571	<p>Norfolk Cricket Board The Norfolk Cricket Board (NCB) is responsible for developing cricket in Norfolk.. To this end it is currently preparing a 5 year Facilities Strategy for consultation, including consultation with local authorities. Copies of the draft Strategy are attached to the covering email.</p> <p>The Norfolk Cricket Board believes that Policy 18 (Communities and Culture) and in particular that part concerned with leisure, will help to deliver the vision and objectives set out in the draft Core Strategy. However, in order to fully ensure this, it will be important to the NCB that in the case of the major housing developments envisaged in the consultation, new cricket grounds are provided together with (a) the necessary ancillary facilities and (b) developer contributions to ensure the maintenance of facilities.</p>	
7593	<p>Norfolk Wildlife Trust Some aspects of this policy may contribute towards economic development but in our view do not contribute towards sustainable economic development. In relation to Policy 16 it would be better to accept that individual transport policies may contribute to some objectives but go against other objectives. In this respect promotion of the use of Norwich International Airport for UK destinations should not be seen as part of reducing contributions to climate change. The same is true for road schemes that will only support climate objectives if it can be clearly demonstrated that saving on emissions due to reduction of congestion outweigh the rise in emissions due to extra car usage.</p> <p>We support Policy 17 on Environmental Assets</p>	
7607	<p>Thurton Parish Council Re the economy (Pol 15) there is no reference to the need for construction work (given the level of growth envisaged). Also there is an opportunity to develop specialisms in environmental goods and services. Policy 16 - Transport. Need more innovative approaches to sustainable community commuting e.g.</p> <p>a) cycle routes in City centre from Park & Ride sites b) join up the existing cycle lanes/ network in Norwich to provide safe and comprehensive provision</p> <p>c) establish mini Park & Ride facilities along bus routes into Norwich. E.g. by making arrangements with local pubs for day-time use of their car parks (a possible revenue for struggling rural pubs too!)</p>	



7638	CGMS Ltd Yes	
7666	<p>Ifield Estates Limited</p> <p>Ifield Estates Ltd agree with Policy 15 of the Technical Consultation which states that the local economy will be developed in a sustainable manner to facilitate the job growth potential of the local economy and deliver the target of 35000 additional jobs established in the East of England Plan. The land controlled by Ifield Estates Ltd east of Broadland Way immediately adjoins the established Broadland Business Park and represents the logical location to accommodate the proposed extension of the present Business Park.</p> <p>The work being prepared in the context of the emerging proposals for Broadland Gate indicates that the Norwich office market is characterised by a limited supply of modern space relative to other key office centres in the UK, partly due to a historic lack of speculative development. The majority of existing office availability is second-hand and located in the city centre. Despite the expansion potential of locations such as the Broadland Business Park, Bi office space availability is likely to remain relatively low in the Norwich Policy Area due to the continued shortage of speculative development, the fact that a large proportion of land is reserved for all employment uses rather than pure office use, user restrictions and viability issues at some sites.</p> <p>The Broadland Business Park is the city's most established, modern, out-of-town office location, It provides an appropriate basis for an expansion of the employment opportunities available within the Norwich Policy Area. In addition, our clients note that the Business Park, and its proposed extension, is well related to the anticipated major urban extension arising at the north-eastern edge of Norwich. Thus, new homes and jobs would be secured in close proximity.</p> <p>Ifield Estates Ltd support Growth Options 1-3 contained within the Technical Consultation as all three potential spatial strategies identify the Broadland Business Park/Thorpe St Andrew as a strategic employment location. Plainly, the enhancement of employment opportunities in this strategically important location forms part of the potential permutations that exist in connection with the establishment of a sound/sustainable spatial strategy for the Norwich area. We have noted that a significant housing growth proposal at the north eastern approach to Norwich also forms part of Growth Options 1, 2 and 3.</p> <p>The existing Broadland Business Park is well established and is one of the best locations to provide pre-let employment space in a sustainable/strategic/accessible location. Accordingly, it is appropriate for the JCS to promote the expansion of the Broadland Business Park. The Broadland Business Park is already an established employment location and the required economic growth derived from the East of England Plan for the Norwich Policy Area will enhance the appeal of the area to significant employment/office space requirements. Planned improvements to the transportation network will improve/enhance the significance of the</p>	



	Thorpe St Andrew area in employment terms.	
7705	Trustees of Beston Estate It appears that there is a risk that land supply will not be available in the early Plan years, because of the timescale involved in bringing forward major sites and long term growth areas. Beeston/NCC land involves fewer owners and technical issues, enabling early phased availability in smaller parcels.	
7709	<p>Pegasus Planning Group Draft Economic Strategy</p> <p>4.11. The GNDP's Consultation on the Draft Economic Strategy acknowledges that, in terms of economic scale, Norwich is the largest economy in the Region. Greater Norwich is recognised in the Regional Economic Strategy as one of the Region's seven 'engines of growth' that will greatly contribute to the development of the wider regional economy. Our clients support the Draft Vision within the emerging Economic Strategy which states that Greater Norwich "will be recognised as a premier UK city region with a thriving, diverse and sustainable economy, providing all its citizens with opportunities and a great quality of life. The significant growth over the period to 2026 will be planned and managed so that all our neighbourhoods and communities will be sustainable, prosperous, equitable, safe, healthy and green." In order to ensure that the area's economy is strengthened, our clients consider that the Joint Core Strategy should acknowledge the positive contribution that the proposed Norwich Gateway can make to the implementation of the Draft Vision contained within the Draft Economic Strategy.</p> <p>Norwich Gateway: Technical Aspects</p> <p>4.12. A strategic employment proposal on Newmarket Road, combined with some further housing, would represent an appropriate response to the strategic location of this general area, adjoining the interchange between the A11 and the A47. The employment aspect of the Norwich Gateway proposal would be well related to the new housing presently being developed off Round House Way. The smaller housing component of the Norwich Gateway scheme would be well related both to the existing/proposed employment areas in Cringleford/Colney and linked to the City Centre by a well-established public transport link from the Thickthorn park and ride site along Newmarket Road.</p> <p>4.13. Appendix one of the Technical Consultation notes that the implementation of Growth option 1 requires highway improvements at the Thickthorn Interchange. One of the primary elements within Growth options 1 and 2 is reference to the significance of the primary public transport route from the south west along Newmarket Road. The Norwich Gateway proposal could be readily delivered in the context provided by the implementation of Growth options 1 and 2.</p> <p>4.14. The Norwich Gateway proposal is part of our clients' longer term investment strategy and they are committed to supporting growth in the Norwich Policy Area based upon a sustainable distribution of new employment locations to key strategic areas. Our clients would note that</p>	



	<p>the plans broadly outlining Growth options 1-3 describe a strategic employment location at Cringleford/Colney, an area that could also accommodate some of the 2,000 dwellings described in Policy 5 as South Norfolk "smaller sites".</p> <p>4.15. The full potential of the Norwich Gateway proposal, incorporating employment land, new housing and green infrastructure, can be achieved by combining sites SNC0027, SNC0030 and SNC0029 described in the present Strategic Housing Land Availability Assessment Consultation.</p> <p>5. HOUSING</p> <p>5.1. We endorse the observation at paragraph 8.4 of the Technical Consultation that, in order to meet the obligation in PPS3 to establish a 15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 23,200 dwellings in the NPA in the period to 2026.</p> <p>5.2. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.</p> <p>5.3. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change.</p>	
7750	<p>Kimberley & Carleton Forehoe Parish Council An opportunity will be missed if Long Stratton does not become a flag ship new town.</p>	
7776	<p>Entec UK Policy 14 set out how the Housing requirements of the RSS will be delivered. The housing provision is dependent upon the 22,102 units built and current commitments. However at the time of writing the</p>	



	current market conditions appear to be a restraint on supply and delivery of market housing. It should be assumed that at least 30% of outstanding commitments will expire as a result. To ensure that the Norwich Policy Area has a reliable supply of housing, Greenfield sites such as Hopkins Homes, should be allocated to ensure the housing requirements of the RSS are met throughout the plan period.	
7807	Long Stratton Parish Council . Probably will - if employment is there. If not then there will still be commuting and the vision and objectives may well not materialise	
7833	NHS Norfolk Yes but in addition, we would like to see a Health and Wellbeing policy as a separate section in the next stage plans to clearly identify the health and wellbeing strategy underpinning the developments. Health Impact assessments can then be used to inform the developments required to serve the populations affected by each option proposal. NICE guidance PH008 http://www.nice.org.uk/guidance/index.jsp?action=download&o=38987 and Planning Policy Guidance 17: Planning for open space, sport and recreation will be used as a reference documents to how each option is assessed	
7847	Scott-Brown Partnership No. Policy 13 - implications of extensive greenfield hosing some in freestanding locations would have an extensive effect on open countryside areas. Policy 14 - Housing distribution should NOT be in accordance with a strategy which is contrary to the RSS in that it relies on a definition of the NPA which is at odds with RSS. Additional housing is justifiable at the main towns in the rural area and especially Diss given its locational and infrastructure assets. Policy 16 - It is unwise to depend on growth at Long Stratton given that the By Pass is not a firm commitment.	
7850	Sport England Policy 18 relates to 'Communities and Culture' and Sport England support the proposal to protect and enhance cultural and leisure facilities as part of this policy, but would suggest that more accurate definitions of what constitutes 'cultural and leisure' facilities should be included in order to avoid misunderstandings at a later stage.	
7854	Wymondham Town Council Wymondham Town Council has completed the question and answer form which has been duly returned to you as part of the above consultation exercise. On behalf of the Town Council I write to express our concern that in various parts of the document there is a presumption that Wymondham is a prime site for large scale development irrespective of the comments you may receive from consultees. I hope that this is not correct and that all sites will be considered, including site 5 which is favoured by this council,	



	<p>on a fair and equitable basis.</p> <p>The Town Council is very keen to retain the character of our delightful market town and its surrounding hinterland and open countryside. The protection of our environment, open spaces and scenic views were highlighted as important issues by residents in our recent 'parish plan' consultation.</p> <p>It is important that South Norfolk Council looks closely at all possible options when determining housing allocations and resists the temptation to site a large proportion of them in Wymondham. It is our view that 'Brownfield sites' should be developed initially with remaining developments then being spread throughout the district.</p> <p>We have always maintained and requested that an 'Area Action Plan' is drawn up for Wymondham before allocation decisions are made to ensure that planned and sustainable developments take place, rather than the current ad-hoc planning applications from developers that we are currently receiving. –</p> <p>It is our intention to closely monitor progress and to continue the present dialogue that we have with South Norfolk Council to ensure that they are fully aware of our views. We look for to the next stage of the process in respect of specific site proposals.</p>	



Q32 Do you support our approach to funding infrastructure and promoting quality in new developments?		
	There were 33 replies to this question. Ten say they support the approach and two object.	
	Issues mentioned include provision of strategic infrastructure, apparent exclusion of cultural assets/ facilities, reduction of carbon footprint, investment in local infrastructure, policing, CIL, proportion of affordable housing, the coordination of various agencies, visitor pressures, green infrastructure, representation for health bodies and sports facilities. Communities mentioned include Easton, Norwich, Harford Bridge, Kirby Cane, Wymondham, Bawnurgh and Long Stratton.	
6866	Anglian Water Services Ltd Provision of strategic infrastructure will be critical to delivering the growth projected in the Core Strategy. Anglian Water recommends that development takes into account practicability and sustainability in considering the provision of strategic utility infrastructure such as water, sewerage, gas and electricity and its potential environmental considerations. Policy 19 hints at this but could be more robust in its intent.	
6918	Theatres Trust Object: In spite of the extensive inclusion of cultural matters throughout the document we are disappointed that cultural assets/facilities do not seem to be included here nor in Tables 1 and 2. It may be that cultural facilities are included within the term 'community facilities' but without a description in a glossary or in the text, this is not clear. The cultural infrastructure of town centres where theatres are normally located has been inadequately recognised in policy statements, for example, PPS6:Town Centres, and PPS12:Local Development Frameworks omit any guidance on the formulation of cultural policies that could encompass the protection and promotion of theatre use. If Local Planning Authorities follow these policy statements they will have no basis for the formulation of planning obligations related to cultural facilities and theatre.	
6975	Andrew Pym Chartered Surveyor The arrangements for funding infrastructure will vary with the size and location of any development. For development in rural communities, the tests will be different from those in main urban centres, and a different set of criteria needs to be identified. The promotion of quality (of design and sustainability) is important in all cases, but the reduction of the carbon footprint across rural communities through improving facilities, improving public transport links and reducing energy consumption in public buildings should form part of the implementation strategy.	
7003	Barnham Broom Parish Council Yes	
7017	Natural England Yes	



7035	<p>Easton College We are committed to working with GNDP and other partners to ensure that development at Easton delivers community benefits through investment in local infrastructure, such as cycle links, bus services and a new village hall. We are actively seeking a partner to deliver a local farm shop which will enable residents to benefit from local, fresh produce and reduce "food miles". We are committed to delivering high quality, environmentally responsible development.</p>	
7091	<p>Hevingham Parish Council The CIL charge (Development Tax) is yet another form of taxation to raise funding hitherto financed by the national taxation and should only be introduced as a last resort if the government can't or wont take the lead.</p>	
7150	<p>Savills The landowners are committed to working with GNDP and other partners to ensure that development at North East Norwich delivers an integrated and sustainable urban extension to Norwich. Key work which needs to be progressed in partnership includes masterplanning and developing an infrastructure delivery strategy. Given the scale of North East Norwich and the likelihood of delivery over a 15 year plus period it will be important that a bespoke approach is taken to the planning and delivery of this major urban extension.</p>	
7193	<p>Savills We are committed to working with GNDP and other partners to ensure that development of a new strategic employment location at Harford Bridge assists in delivering a balanced growth strategy for the Norwich sub-region. The development can also assist in delivering wider community and environmental benefits by assisting with the delivery of the River Yare Parkway.</p>	
7195	<p>South Norfolk Council</p> <p>Paragraph 8.6 You state that 43% of overall housing need can only be met by affordable housing. This is not a figure which can easily be verified by someone who was not involved in the research. It might be helpful to cite the source. It most obvious in Figure 150 of the ORS Greater Norwich report: $(277 + 564) / 1,938 \times 100\% = 43.4\%$.</p> <p>Whilst 40% affordable housing appears to be reasonable, there is no justification for the proposed percentage. The reader might note that it is the only round number between 35% and 43%, but is this a reasoned justification for the actual figure?</p> <p>Also, we suggest wording the text as 'a minimum of 40%', so that numbers will always be rounded up</p> <p>Paragraph 8.7 We have strong reservations about the proposed method for calculating the commuted sum for off-site provision of affordable housing:</p> <ul style="list-style-type: none"> • Reference to 'the average Housing Corporation grant for the type of housing' is insufficiently precise. Averages vary, depending on: • When the average is calculated: the Corporation works to targets and the grant it is willing to provide can vary, depending on 	



- whether its priority is to minimise grant per dwelling or to ensure that its programme budget is spent,
- Design standards (e.g. level for the Code for Sustainable Homes)
 - Source of land,
 - Any other public subsidy which reduces the Housing Corporation's contribution,
 - Any private subsidy - please note that any commuted sum used in a corporation-funded scheme is not regarded as public subsidy,
 - The amount an RSL has chosen to contribute from its own resources.
 - We query whether a commuted sum based on the value of the land plus the Housing Corporation grant is the correct formula. (land value) + (grant) + (RSL purchase price) does not equal the development cost. We suggest an alternative approach: (land value) + (construction costs) + (on-costs) - (RSL purchase price).
 - Because affordable housing build standards are higher than open market standards, any reference to costs should specify Housing Corporation requirement costs.
 - At a time of high inflation, any formula means that the sum provided might not deliver equivalent affordable housing. There are likely to be delays in identifying development opportunities:
 - Interest earned might not match increased building costs.
 - Most S106 agreements include a clause requiring the commuted sum to be spent by a specified date. If suitable opportunities do not arise, the sum would have to be spent in a less than ideal way, leading to lost value for money.

We suggest that this paragraph be re-worded to change the emphasis from a request by the developer to a financial contribution being a last resort acceptance by the local authority.

Paragraph 8.8

Whilst they are a useful data source, we believe the explicit requirement for local housing needs assessments in the second and third sentences of this para could lead to further delays in what is already a difficult process for delivering affordable housing in our rural communities. District-wide needs assessments (such as the 2006 ORS survey) together with information held on Local Authority Housing Registers can provide relevant information required.

We fully agree that there will be times when a local needs assessment will be the most appropriate way to proceed, but would prefer the technical document not to insist on this particular process.

In addition to the above, South Norfolk Council recently reviewed our smaller rural parishes, and re-classified a number of them as 'sustainable' [for small local-needs affordable housing developments], based on the range of key local services available within the village (i.e. shop and/or post office, regular public transport route etc). The intention was that small affordable housing schemes could then be progressed in these villages without the need for a local needs assessment (instead, the 2006 ORS survey can be used together with information on the South Norfolk Housing Register). This review has enabled us to expand the delivery of



	<p>small affordable local-needs housing schemes in a wider range of rural villages. Unfortunately, many of these villages appear not to have been included within the proposed technical document's hierarchy category of 'Other Villages'. From South Norfolk's perspective, this unfortunately presents us with a 'one step forward, two steps back' scenario, where delivering affordable housing could once again become more difficult and time consuming if there is an insistence for local needs assessments in all other villages not included within the 'Other Villages' category.</p> <p>With the above all in mind, we therefore suggest a slight re-wording to:</p> <p>"Exceptions site allocations will be considered in settlements classified in the hierarchy as Other Villages or above. Applications for exceptions sites will be considered in these settlements without a specific need assessment, while applications underpinned by up-to-date evidence of need will also be considered in other settlements as appropriate."</p>	
7206	<p>Persimmon Homes We support in principle the use of CIL as this provides more certainty for developers and should spread some of the cost of growth related infrastructure between different types and sizes of development. However, it is essential that, in developing this approach, there is a direct relationship maintained between the process for establishing the charging schedule, the infrastructure planning process and the development plan strategy. It is also essential that the relationship between CIL and planning obligations is such that there is no confusion or double payment. The setting of CIL at a realistic level is also something that should be both fully consulted upon and examined independently as part of the LDF process.</p> <p>We are very concerned about the intention to require developers of major strategic growth areas to guarantee development in full and guarantee the long term maintenance of physical and social infrastructure provided. Given the current state of the market and the history of peaks and troughs in the housing market and the economy, this is an unreasonable imposition that could well be counter-productive and not assist in bringing development forward.</p>	
7245	<p>Mr Richard Atkinson Yes, we welcome indications that the CIL mechanism will include for the assessment of viability of new development proposals so that realistic demands for infrastructure payments are made by the authorities</p>	
7248	<p>RPS The use of CIL should, in principle, provide more certainty for developers and spread some of the cost of growth related infrastructure between different types and sizes of development. However, it is essential that, in developing this approach, there is a direct relationship maintained between the procedure for establishing the charging schedule, the infrastructure planning process and the development plan strategy. It is also essential that the relationship between CIL and planning obligations is such that there is no confusion or double payment. The setting of CIL at a realistic level is also something that should be both fully consulted upon and examined independently as part of the LDF process.</p>	



7256	Les Brown Associates Our final comment relating to the need for caution in applying the C.I.L. in respect of all those items listed under table 2 and ensuring developers do not end up funding commercial enterprises (for example utility providers/dentists) who then go on to profit from developer contributions. It is essential that the housing development industry remains viable and can afford to acquire land in order to fulfil the requirements for new homes within the period of the finally adopted plan.	
7266	Barton Willmore Implementation of the policies in the plan will depend on the co-ordinated activities of a number of agencies. it is essential that necessary infrastructure is provided in tandem with new development and at appropriate times in the development process.	
7301	Breckland District Council Utility providers should not only take full account of the infrastructure needed to deliver the Joint Core Strategy but should also ensure that infrastructure networks in the Greater Norwich area take full account of the of utility requirements of communities beyond the plan area where growth is also dependent on those networks. I trust these comments are of assistance. Breckland Council will shortly be publishing an A11 Energy Study and a complimentary copy will be provided to the Partnership for reference.	
7315	Norwich Green Party Infrastructure Funding 12. We have no major objections to the proposed mechanism of funding via a Community Infrastructure Levy but would need more information on the level of democratic accountability of the proposed local infrastructure management bodies. It is not clear how these bodies would functionally relate to the Economic Development Boards (as envisaged in the current unitary proposals) which have been a source of objection from us due to their unrepresentative nature. 13. The uniform rate of the CIL is a concern as this may discourage development on brownfield sites where, for instance, additional expense to deal with contamination may be required. The categories listed under 'Infrastructure Likely to be Funded Through a CIL' are broadly acceptable, though we would like to see more emphasis on measures to promote biodiversity and counteract any possible negative environmental impacts.	
7354	Mr Jim Hamshaw Yes	
7392	I E Homes and Property Yes	
7486	Hethersett Parish Council In principle and generally yes	



7513	<p>Keymer Cavendish (6.14</p> <p>Page 63</p> <p>Table 1: Developer contributions</p> <p>Community infrastructure levy (Cit or ML) With house prices falling by 20% -30% and development land values falling by 60% -70% from the peak of 2007, we are witnessing conditions markedly similar to those of 1988/89.</p> <p>Against this background, with the development industry on its knees, we see the government introducing what they call CIL and what the industry calls KIL.</p> <p>For instance, to state that this will be charged at a uniform rate and that it will not differentiate between previously developed land and greenfield sites, will have the inevitable result that only greenfield sites are viable to develop and previously developed land is not. This outcome is in direct contradiction of government objectives for recycling previously developed land.</p> <p>The endless list of facilities and services to which development is to contribute is totally impractical in the current market. If any houses are to be delivered by the private sector on a strategic scale, a commercial appreciation of the realities must be grasped by the planning authorities.</p> <p>With perhaps 30% of a site being taken up with roads, play space and playing fields and 40% of the residue being consumed by affordable housing, there is remarkably little space left with which to generate the value this Plan seeks to exploit for community purposes.</p> <p>I speak not as a champion of the private sector but as a commercially-aware town planner, qualified as a chartered surveyor, who appreciates the crisis now facing the housing industry and, indeed, the impracticality of community 'shopping lists' drawn up in a buoyant market.</p> <p>Until market conditions improve, only smaller sites which can draw on existing physical and community infrastructure will be viable and it is these sites which should be promoted first while the market has time to recover and make the larger schemes viable.</p> <p>6.15 Page 63</p> <p>Table 2: Nature of Infrastructure Likely To Be Funded Through a CIL. (KIL)</p> <p>In the current market, if all the facilities listed were to be funded from the Community Infrastructure Levy, it is likely that it would need to be charged at approximately 150% of the site value. As a matter of principle, it should be noted that facilities such as primary health care and dentists are, in any event, private sector services which could - and should - be funded by the operators themselves.</p>	
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	<p>Similarly, the utilities such as electricity, gas and water are provided by private sector companies, who should pay for the privilege of servicing a new development. The CIL should not benefit them.</p> <p>Keymer Cavendish September 2008 9 Map 22: Estimated housing capacity of broad locations within the proposed Stevenage and North Hertfordshire Action Plan</p>	
7528	<p>National Trust</p> <p>The National Trust is a registered charity founded in 1895 to promote the permanent preservation of places of historic interest or natural beauty for the benefit of the nation. It carries out this purpose through ownership and management of property and through the use of advocacy and partnership.</p> <p>The Trust owns the Blickling Estate and properties along the Norfolk coast that could be affected by the increased visitor pressure that the amount of development proposed will bring.</p> <p>The Green Infrastructure Plan which forms part of the evidence base to the LDF approach is generally supported but for it to be genuinely sustainable there will be a need to consider Green Infrastructure provision in the wider context (ie. Beyond the boundaries of this document).</p> <p>In this context it will also be essential for the Plan to identify an implementation programme which involves key delivery partners.</p> <p>The National Trust would like to be consulted on any proposals that could link Norwich to the wider countryside and more specifically to any of its sites.</p> <p>This will facilitate the management of existing sites and could help to explore whether the organisation has a role in delivering some of the recreation and biodiversity objectives of the strategy.</p>	
7548	<p>Mr Richard Atkinson Yes, we welcome indications that the CIL mechanism will include for the assessment of viability of new development proposals so that realistic demands for infrastructure payments are made by the authorities</p>	
7570	<p>Norfolk Constabulary - Force Architectural Liaison Officer (Mr Duncan Potter) [7653] Implementation (Planning obligations/infrastructure levy) Norfolk Constabulary objects to the approach currently listed as this doesn't specifically make reference to the police within the list of infrastructure.</p> <p>Norfolk Constabulary considers that the approach accepted by the North Norfolk District Council Planning Inspector is to be accepted and consideration of the future community levy approach should take account of:-'Section 6 of the Police Act 1996 places a duty on Police Authorities to</p>	



	<p>secure the maintenance of an efficient and effective Police force for its area under the direction and control of its Chief Constable. Section 17 of the Crime and Disorder Act 1998 provides further relevant guidance, and requires the Police, in addition to a number of other agencies to consider crime and disorder reductions and community safety in the exercise of all its duties and activities.</p> <p>A wide variety of development proposals place additional demand for police resources both in terms of the need for additional capital investments in new police facilities and funding for additional police officers and police staff. These additional demands on police resources will manifest themselves in a variety of forms and include(1) Additional officers and staff (2) The need to acquire land and the capital costs of police buildings and associated facilities for the provision of new police stations (3) Extend existing police stations (4) Replace temporary and permanent accommodation (5)Provision of new vehicles and other resources to police new developments (6) Extension of existing communication infrastructure; and (7) Crime reduction measures in line with 'Secured by Design' principles.</p> <p>Having regard to the above legislation, it is therefore reasonable for police needs to be taken into account by local authorities when determining planning applications relating to the provision of new development. Planning Policy Statement 1, The East of England Plan and the ODPM's Safer Places - The Planning System and Crime Prevention demonstrate a clear need to create safe environments which minimise the opportunities for crime.</p> <p>The police authorities, including Norfolk Constabulary, have a key role to play in meeting this objective. Circular 05/2005 'Planning Obligations' provides Central Government advice on planning obligations under Section 106 of the Town and Country Planning Act as substituted by the Planning and Compensation Act 1991. This guidance states that the aim of planning obligations is to make acceptable development which would otherwise be unacceptable in planning terms. It states that planning obligations can be used to mitigate a development's impact. Most forms of major development will increase the demand for policing and it is reasonable to seek contributions from developers to mitigate this impact.'</p>	
<p>7594</p>	<p>Norfolk Wildlife Trust We are concerned at the relatively low priority given to green infrastructure. There should be a GI implementation and funding strategy based on the needs rather than funding being steered towards an ad hoc collection of projects that come under the heading of GI but are promoted by different partners. GI is a critical part of infrastructure and should have an agreed percentage of CIL funds. Mid Bedfordshire council has developed a costing for GI based on implementation of the district biodiversity action plan and we suggest that this approach is considered for GNDP area.</p> <p>It is also critical that funding streams allow key habitat creation elements of GI to be put in place at an early stage in development so that they can have a chance to mature before development takes place.</p>	



7639	CGMS Ltd Yes, we welcome indications that the CIL mechanism will include for the assessment of viability of new settlement proposals so that realistic demands for infrastructure payments are made by the authorities	
7650	Drivers Jonas CEMEX request that the Council considers the southern site at Kirby Cane and the Wymondham site for residential use. CEMEX also urges the Council to consider their site in Norwich for employment or mixed-use development. Finally, CEMEX would like the Council to consider their site in Bawburgh for leisure related uses or as a future water sports venue. On behalf of CEMEX, we request that we be kept informed of progress with this and future LDF documents and with to reserve our client's position to submit further representations on subsequent documents.	
7706	Trustees of Beston Estate Paras.9.4-9.7 about realistic development contributions are key issues for an owner who is so totally affected by NNDR timing and compensation vs. CIL and sec.106 costs	
7751	Kimberley & Carleton Forehoe Parish Council Funding should be focused in the main on a properly though through new town at Long Stratton with very little development else where; creating infrastructures from scratch to meet today's needs is more cost effective than trying to make old towns meet new needs.	
7808	Long Stratton Parish Council Only if it is guaranteed that the finding will definitely be available before decision is made to proceed on any of the options. No mention of upgrading telephone lines for Broadband to go optic cabling with greater speed!	
7834	NHS Norfolk In principle, NHS Norfolk supports the process. However, it is important that we are represented in the process of establishing the health element of CIL and we would wish to be a partner in the Integrated Development Plan process.	
7851	Sport England Sport England supports this approach to implementation and is particularly pleased to see that indoor and outdoor sports facilities are listed within the types of facilities that will benefit from the proposed Communities Infrastructure Levy. Sport England have a wealth of evidence and planning tools that can help in the calculation of the level of contribution that can be expected for sports facilities, and what the local priorities should be in determining where the money will be spent: Norfolk County Sports Facilities Strategy (due for completion October 2008) Sport England Planning Tools (can be accessed via: www.sportengland.org): a) Sports Facilities Calculator b) Facilities Planning Model c) Active Places Power (www.activeplacespower.com) Sport England would be happy to assist further in assessing the need for sports facilities within the Greater Norwich area if this would be helpful, including advice on the use of any of the strategic planning tools referred to above.	



Anything Else?	
	There are 58 replies in this section. Two are anonymous and do not address the consultation.
	Many of the replies in this section are complex, and do not permit of ready summary, however included are proposals for specific sites, the extent of development, green issues, infrastructure, eco-towns, sustainability, coordination of growth in the A11 corridor, the economic climate, Gypsies and Travellers, Norwich Airport, and rail freight opportunities. Communities mentioned include Marsham, Hethersett, Wymondham, Little Melton, Great Moulton, Aslacton, Acle, Aylsham, South Walsham, Diss, Thorpe End, Stoke Holy Cross, Drayton, Frettenham, Diss, Norwich, Long Stratton, Wroxham, Mangreen, Sprowston, Rackheath, Felthorpe, Salhouse, Harleston, Reepham, Trowse, Loddon, Norwich, Attleborough, Snetterton, Thetford, Coltishall, Mousehold Heath, Cringleford, Little Plumstead, Long Melton, Trowse and Brandon.
6798	<p>Bidwells Bidwells have recently been appointed by Crane and Son to promote the Former Piggeries site at Fengate Lane, Marsham, through the Local Development Framework (LDF) and Strategic Housing Land Availability Assessment (SHLAA) processes. Initially, I am formally registering the Former Piggeries site at Fengate Lane, Marsham as being available for development. I therefore request that the land is considered and assessed for development through the Council's current Joint Strategic Housing Land Availability (SHLAA) process and eventually also through the forthcoming Site Specific Allocations Development Plan Document (DPD). A plan of the land is attached to this letter. I will review the Joint Core Strategy Options consultation documentation when it is published and consider a more detailed response in respect of delivery aspects in due course In the meantime, the following general comments are made: I contend that the Core Strategy should recognize the importance that settlements outside of the Norwich Policy Area including Marsham will have in accommodating and delivering growth The Vision and Spatial Strategy needs to acknowledge that that key villages (service centers and other villages) such as Marsham will need to accommodate levels of growth appropriate to their size, role and function so that they continue to maintain their important role of service centers serving rural communities We suggest that any growth targets applied to such settlements are not expressed as ceilings to development but rather targets to be reached and breached in appropriate circumstances ie to achieve sustainability objectives I intend to pursue the site's allocation, potentially as a mixed use development site (employment and housing) through the forthcoming Site Specific Allocation's document process.</p>



6799	<p>Forestry Commission As you are probably aware, the Forestry Commission is the Government Department with statutory responsibility for trees and woodland and we welcome the opportunity to comment on this "call for evidence". The responsibilities and powers of the Forestry Commissioners in relation to planning are derived mainly from the Forestry Act 1967 and the Environmental Impact Assessment Regulations 1999 (see Annex 1). Our interests lie in the protection of trees and woodland, and on the use of trees and woodlands to enhance, and mitigate against the effects of, development. We can provide guidance on Government policy on these issues. Government policy highlights the importance of trees and woodland, particularly Veteran Trees and Ancient Woodland and there is a clear presumption against development that results in their loss, unless there are overriding public benefits arising from the development (see Annex 2). Should development lead to the removal of any trees or woodland, or in any way detrimentally affects such trees or woodland, the Forestry Commission would expect significant mitigation measures to be employed. The opportunities for trees and woodlands to mitigate development in Greater Norwich should reflect Policy ENV5 Woodlands of the East of England Plan, which in turn reflects the Regional Woodland Strategy . The issues of most importance to trees and woodland that should be reflected in development plans are as follows:</p> <ul style="list-style-type: none">• Renewable Energy - the proposed renewable energy policies should include wood for heat (see Annex 3)• Flood amelioration - woodland can contribute to sustainable flood control• Green infrastructure - trees and woodland have a number of specific roles within green infrastructure• Brownfield land - woodland has a unique role in on-site containment for some contaminants <p>The Forestry Commission has considerable expertise in the delivery of sustainable planning solutions through the use of trees and woodland. We have intelligence on brownfield remediation, land regeneration, community engagement and renewable energy solutions. The Forestry Commission are the largest managers of green space in the region, with a track record of delivering large scale peri-urban accessible areas. Greater Norwich is partly defined by, and important for, its trees and woodlands. As such, we would hope and expect that your officers treat these issues seriously.</p>	
6800	<p>Hethersett Society I refer to the Technical Consultation paper and note that between 2001 and 2026, 47,500 new homes will have been planned, and that 7,500 new homes have already been built and a further 14,700 given planning permissions. A further 2000 new homes can be provided in rural areas. These figures were as at April 2006 and it is imperative that the total picture is taken into account. It should not be difficult for the respective authorities to provide up-dated figures from 2006 to date. I assume that such development includes in-fill (single dwellings in back gardens, etc.) for in Hethersett in three years from data supplied by South Norfolk District Council more than 70 in-fill dwellings were constructed or permitted. Multiplied across the whole area this could be a significant figure. Whilst I have not seen any sound reasoning for the figure quoted for new dwellings, I accept that a number of such dwellings are required. Some of the needs for such dwellings might be questioned, but, perhaps, not here. Looking at the preferred options only one appeals</p>	



	<p>to me - Option 3. Not just because I reside in Hethersett, but for a variety of reasons. Firstly, I advocate that the development should not extend beyond the Norwich Southern By-pass, and that all the green spaces south of the by-pass should be preserved. Secondly, it has been reported that certain 'experts' believe that development should follow the A11 trunk road -why? How many of these 'experts' recall that one of the main reasons for the 1947 Planning Act was to restrict development along trunk/major routes. Do they want urbanization all the way from Norwich to Attleborough? I am concerned with the infrastructure needed for development of this kind. The introduction of a number of eco-towns would go a long way towards meeting these requirements, including such structures as sewers, treatment plants, highways, etc., which would need to be in place before any of the homes are finished. I speak from experience. For instance, the main sewer from Hethersett was pronounced in 1980 by Anglia Water as having reached its capacity, and that no further development should take place until an additional main sewer was installed. It never has been, although the village has more than doubled in population in the time. It is true that an interception tank was installed in Station Lane, but this proved to be inadequate, with it overflowing three or four times a month. Tankers were then used to remove sewage and dispense it in sewers in Wymondham Is that the way to proceed? These eco-towns could be suitably encased by green pastures, etc. My other experience arises from more than 35 years in local government, retiring as a Chief Officer of a London Borough. Fourthly, the addition of 20 -50 dwellings in Hethersett would be minor compared with development recently constructed or approved. Keep us separate from Wymondham and Little Melton.</p>	
<p>6803</p>	<p>Storeys:SSP I will limit my comments to a response to policies 8, 9 and your questions 26, 27, 28 and 29, specifically relating to land at Simpson's Malting on Moulton Road immediately adjacent to the settlement boundary of Great Moulton & Aslacton as detailed in the existing South Norfolk Council Local Plan and shown on the attached plan. It is felt that the proposed policies do not fully reflect the sustainability of the development prospects of this site. The site is adjacent to Aslacton which is detailed under Policy 9 - Other Villages where only infill or small groups of dwellings and small scale business or service developments will be allowed. Firstly, it is clear from viewing the enclosed plan that the site and adjacent properties form part of the same developed area as the village with no clear intervening land form or feature which would denote the edge of the settlement and consequently should be included within the defined development boundaries. Secondly, the settlement has a number of the characteristics/facilities that merits the inclusion of settlements in Policy 8 - Service Villages. The area has a journey to work bus service, a bus stop outside of the site enables access to services to both Norwich and other key service centres. As I am sure you are aware a village hall, primary school, food shop and Post Office are available within a reasonable reach of the residents of this settlement. As such the site and settlement should be considered to be a sustainable location for development of a scale proposed by policy 8. Consequently, policies 8 and 9 should be revised to include Aslacton, and consequently this site. Sensitive development of such sites within these villages of a size and type similar to Aslacton can sustain and enable growth in local services and communities with limited publicly funded investment in infrastructure and affordable housing, top</p>	



	the long term benefit of the local area and community. I trust that you will take the points raised into consideration when you progress your plans. Please note I have also forwarded details of the site for inclusion in the SHLAA.	
6827	Acle Parish Council Acle Parish Council understands the inclusion of the village as a Key Service Centre. The councillors object to the suggestion that 100 - 200 more houses should be built in the village and further object to the statement at 7.17 that "infrastructure and environmental constraints limit its (Acle's) potential to accommodate new housing development. However, because no allocations can be made at Aylsham, an allocation of between 100 - 200 dwellings is proposed.." Councillors have stated that the sewerage system in Acle is also already at its limit and indeed tankers are already used to cart sewage away as the system cannot cope. They do not understand therefore why Acle is being used to "mop up" the housing allocation for Aylsham. The Primary School and High School are frequently full, with Acle children being taxied to South Walsham and elsewhere. The Medical Centre is oversubscribed with appointments very difficult to obtain. The councillors believe that the new dwelling should be limited to a maximum of 100. They understand. that the village has good transport links to Norwich and Gt. Yarmouth, but there is limited employment locally. Some new houses would be welcomed as it will enable the community to grow and to support the existing businesses and services. The councillors would support housing only on those sites identified in the recent site specific consultation	
6829	Beighton Parish Council The councillors feel unable to comment on the vast majority of this document.	
6871	Parish Fields Practice I am writing on behalf of the Partners of the Parish Fields Practice, one of the two GP Practices located in Diss. As you will be aware, Diss has been growing steadily over the past 30 years, with the two Practice's patient population growing at around 200 patients per annum. However, this has not and is not always been supported by a growth of infrastructure. The two practices and the community health centre based in Mount Street are currently awaiting an extension and development programme that will allow services to be delivered in a more appropriate environment. Whist this development has received planning permission, it is currently on hold due to constraints at NHS Norfolk, however it is hoped that this will go ahead with completion by around 2010 to 2011, thus allowing better services to the growing populations. There are concerns about the levels of growth within Diss, particularly in the provision of social housing and the impact that this has when additional resources are not provided. Diss currently has the second highest number of underage pregnancies in South Norfolk and has an increasing number of patients who are dependant on drugs and alcohol, It is essential that social resources are allocated in order that these types of issues can be addressed. The Diss Practices are currently working as part of the South Norfolk health Improvement Partnership (SNhIP). This group works on Practice Based Commissioning of health services and is developing links with South Norfolk Council in order that joint health objectives can be established. This may be one forum that can help shape the infrastructure requirements for the joint core strategy.	



6872	<p>Keymer Cavendish I understand that there has been consultation on a more technical level in respect of the above; for some reason I was not included on the mailing list for this. Nevertheless, I thought it appropriate to bring to your attention the continued availability of my client's land at Heath Farm, Thorpe End - a site amounting to 10 hectares. You will be aware that I have never proposed that this land should be promoted or developed in isolation but rather that it should form part of a string of development, linking housing to the Broadland Business Park to the south. This single carriageway eastern relief road running from the A47 through to the Wroxham Road could form an interim relief road pending the completion of the proposed northern distributor road (NDR). However, this is not a highways road scheme, as development is already allocated southwards from the Wroxham Road east of Blue Boar Lane and I understand that it will, in due course, work down to the Salhouse Road. Development of the Valori land and other land ownerships adjacent namely Fairclough to the north and Mr Barker to the south, would provide a missing link to assist with this. Vital to the sustainability of development in this location are:</p> <ul style="list-style-type: none"> a. The good bus services running into Norwich b. The easy cycling links to the Broadland Business Park where there is, as you know, extensive employment. <p>I am, of course, aware that the scale of the proposed strategic release in the area is far greater than the area I have identified, but I do feel that the early release of the scheme identified would assist in the early provision of a relief road. Once the NDR is built, this road would still maintain a function for the internal distribution of traffic within the city and would, of course, aid accessibility to the major employers at the Broadland Business Park. I look forward to maintaining dialogue with you on this exciting LDF review.</p>	
6873	<p>Anon You will only do whatever you want. we are but mere pawns. Whatever. No faith in N.C.Council what so ever. Why bother asking and wasting more money.</p>	
6874	<p>Anon That will be something to see the local people have not seen much of these 3 for a long time (but others have) and we can go on a list to go on a list. (comment on housing affordability and employment)</p>	
6882	<p>South Walsham Parish Council The councillors feel unable to comment on the vast majority of this document. South Walsham Parish Council supports the inclusion of the village as a Service Village. The Council welcomes the opportunity for small-scale development in the village; there is a need for houses of various sizes in the parish as it is a popular village with all age groups. The councillors believe that small-scale development is essential to the survival of the primary school, the shop/post office and the pub/restaurant. The Council also supports the concept of affordable housing on exception sites, linked to local communities.</p>	
6892	<p>Kidner Farming Limited Further to my recent representation to the Joint Core Strategy on behalf of Kidner Farming Limited in respect of land to the rear of Stoke Holy Cross Primary School, please find enclosed a site plan and indicative masterplan, both of which were omitted from the original correspondence. I trust you will be able to process this additional information along with the original representations made on behalf of</p>	



	Kidner Farming Limited and ensure that they are taken into consideration as a formal part of the public consultation. I trust the above is in order; should you have any queries relating to matters arising in this letter or as a result of the attachment, please do not hesitate to contact me.	
6893	Drayton Parish Council The planning committee of the parish council discussed, at their meeting held 26 August the above. it was agreed to contact you in order to gain statements from you of specific developments within a 5 mile radius of Drayton thus allowing this council to comment on what the impact of such developments will have on Drayton.	
6894	Frettenham Parish Council Further to your letter plus documentation of the 1 August 2008. Frettenham Parish Council fully supports POLICY 9 OTHER VILLAGES. We would inform you that Frettenham does have a Brown Field Site suitable for industrial development: Old LPG Site, situated off Harbord Road, Frettenham	
6903	Greenhouse Environment/ Co-op Learning Network While we welcome the general thrust of the proposals being made, we are concerned that the commitments to sustainability lack both ambition and any specific measurable targets. For example, we would look for the final document to include specific targets to reduce carbon emissions in the area covered by the GNDP by 60% below 1990 levels over the life-time of the policy in line with internationally accepted scientific	
6988	Diocese of Norwich Policy 14 proposes that affordable housing will be provided as part of new housing developments at a proportion according with most up to date study of housing need and / or Housing Market Assessment. It is not appropriate to establish required levels of affordable housing provision to be provided as part of new development, without testing these requirements through the consultation and examination processes of Development Plan Document preparation. This requirement to establish affordable housing requirements through Development Plan Documents is set out within Policy H2 Affordable Housing of the East of England Plan. It is noted that a figure of 40% is referred to within supporting text to Policy 14. This figure, or any alternative appropriate figure, should ideally be confirmed within Policy 14 or a related policy within a separate Development Plan Document, with the required percentage therefore tested through consultation and independent examination.	
6989/90	Diocese of Norwich I think two particular concerns came up; one of them was the traditional role of the Church in helping to form community. I think there was a feeling that communities don't just happen and that we as a church need to be more closely involved in what is happening and what is being developed. We wondered how we might do that and explored various ways of being more closely involved in what is going on. The second issue that concerned us was the way in which people come up from the South and buy up three or four properties at a time. Invariably this militates against local families as large numbers of properties get bought up on the buy to let band wagon. We wondered how the Development Partnership would prevent this happening and so increase the opportunities for local people to get on the housing market. We realise that it is not really possible for councils to manipulate the	



	<p>market, but we felt there must be some way of safeguarding the first time buyers against those who are in it to develop a property portfolio. Again, we are enormously grateful to you for giving up your time to come and talk to us and we shall certainly keep an eye on what is being developed and how we can be involved.</p>	
6991	<p>Peacock & Smith We write on behalf of our clients, Wm Morrison Supermarkets Plc (Morrison's'), to comment on the Technical Consultation of the Joint Core Strategy for Broadland, Norwich and South Norfolk. Accordingly, please find comments below and on the enclosed comments form. Morrison's is a major foodstore operator with existing stores within the study area at Diss and Norwich. The company would therefore like to be kept informed and consulted on further stages of preparation of documents, which are to comprise the Local Development Framework. Our clients support the overarching policies of the draft Core Strategy. In particular they support the broad aims set out in the settlement hierarchy: this gives clear guidance as to the level of services appropriate in different categories of settlements, and also directs growth towards the most sustainable settlements.</p>	
7041	<p>DPP To assist the clear application of policy, we would suggest that the identified retail hierarchy follows the specific typologies identified in PPS6 'Planning for Town Centres'.</p> <p>2 Turning to assess the extent of the town centre, we consider that our client's land should be included within the defined town centre boundary. PPS6 'Planning for Town Centres' advises that the defined town centre boundaries should include "areas of predominantly leisure, business and other main town centres uses within or adjacent to the primary shopping area".</p> <p>3 The site is immediately adjacent to the 'Central Business Area', as defined within the adopted South Norfolk Local Plan.</p> <p>4 However, given the established commercial use and its allocation within the Local Plan for retail and leisure purposes, it is clear that the site it is an important part of the town centre. This should be formally recognised and the 'Town Centre Boundary' should be extended to include land south of Park Road, Diss. The inclusion of the land within the defined boundary would maximise the potential to enhance the town centre's vitality and viability. However we do not consider that our client's site should be brought forward in line with an Area Action Plan, as suggested by paragraph 7.11, given that the site would be able to be developed in the short term with an application likely to be before the Local Planning Authority within the coming months.</p> <p>In summary, we would wish to highlight the following points: We agree that Diss should be identified within the retail hierarchy as a 'Town and Large District Centre'. The town centre boundary should be extended to include land south of Park Road. Land south of Park Road should remain allocated for retailing purposes but it is unnecessary for it to be the subject of an Area Action Plan as it is ready for development now. In accordance with national planning policy guidance in PPS6 'Planning for Town Centres', and having regard to the findings of the 'Norwich Sub Region: Retail and Town Centres Study' 2007, the next stage of the Joint Core Strategy should have regard to these comments.</p>	



7050	<p>Mr & Mrs L Dale Throughout the document and its predecessors, the word "will" is used in the context of "vision" and never qualified or the more appropriate word "could" be used; in my experience a local politician spanning 9+ years now, I never promise what I cannot guarantee to deliver. On Page 57, the qualifying words on implementation could be harder....."no infrastructure.....no go". Trying to squeeze more out of developers, who must at least break even, in a constrained post credit crunch market place, will surely be futile? Whether its dressed up as S106 or CIL, there is an overwhelming list of worthy causes, deemed to be supportable by developers, in the face of a Government defaulting on the financing of the demise of Norfolk's green countryside, which it implicitly demands be ceded. Despite my suggesting to Alan Gomm, that a railway study was important, this has never been taken up and your chart on para. 4.4 pages 14-15 totally misses the fact that Thorpe Station is already near maximum capacity and if that problem was fixed and the extra capacity used, then the single decked Wensum swing bridge would soon be the limiting factor. In consequence and addition, there is no record of what might be achieved by reestablishing lost rural railway stations and enhancing public transport corridors with commuter trains in path gaps between existing services. The establishing of guided busways on either of the two old railway beds into Norwich has not even been considered; the fact that lands all the way to Melton Constable could be opened up is missed and the potential reduction in road traffic on the northwest approaches to Norwich, ignored. If the implicit vision of a lower carbon footprint and less use of personal motor cars on Page 18 is to come true, there will need to be greater subsidy of bus based transport. [One wickedly wonders whether greater bus subsidy across rural Britain would generate greater carbon saving than the Government's investing our monies in wind turbines!?.] On Page 19, I find it hard to equate Hetherset with the likes of Wroxham as a Key Service Centre. Service Village status would be more appropriate. On Page 22, objective 10 is meaningless in context of Highways Agency controlled roads. On Page 25, I am incredulous that the dualling of the A11 is not mentioned as key to growth, when this road is the principal link to the Midlands and London. On Page 28, in the light of our new Option 3, the railway to Ipswich should be included as a potential subject for investigation of new enhancements. On Page 29, I wonder how the car choked inner city roads could possibly be regarded as an efficient transport modal interchange - its almost quicker to walk from St Stephens to the rail station. On Page 33, policy 5 and policy 13 on Page 47, I wonder what teeth we will gain, to demand particular design styles, when we already have examples of government maximum plot density, resembling inner city estates, crammed into our rural villages. On Page 43 and elsewhere, I'm pleased to see that farmyards could be redeveloped for benefit of other uses or housing; a "MUST" for the new local plan; and while I'm about it, rural road egresses will need to be accepted as extant or County obliged to sort them out. [The egress at Lotus is far worse than that on the road to Hempnall where the County would have had the FT Construction application refused because of marginally short sight lines.] On Page 51 [or elsewhere], I would be keen to see any CHP installation linked with potential glasshouse horticulture; a very synergous opportunity, given the enormous amounts of timber burned to total waste in the semi-public woodlands of Norfolk, and the need to create jobs. [why should Holland be the horticultural hothouse of</p>
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	<p>Europe?]. On Page 74, I must endorse the Mangreen area as having much more potential to deliver a sustainable new village [than H'sett/L.Melton] with the three opportunities for [1] a guided busway [to the Norwich Victoria trackbed and thence the bus station], [2] the existing A140 road and [3] commuter rail station and possibly a new Norwich "parkway" station as well. The very probable transport scenario in an era 50 years hence, of sky high oil prices and possible flooding of the Norwich low level rail assets [assumed re my fleeting sight of GNDP flooding study map and re Norfolk Climate Change Study document as agreed at SND Council 22-8-9], may well be vital in the need for a new location of a major NEW rail interchange and modal shift to road or guided bus. Compare this scenario to the overloaded B1108 or the A11 Newmarket Road, which would be the preferred routes into Norwich City for the H'sett/LM village proposal. Further, the Long Stratton expansion into what I assume will be a fully "sustainable" community, is the last chance to gain a bypass and importantly remove a major blockage on the road to Ipswich. Initially built single, its design and implementation should remain reserved for retrospective dualling.</p>	
7116	<p>Tesco Stores We would also like to suggest a modification to growth option 3. As an alternative to progressing a standalone 'new town' south of the city, we believe there would be significant merit in developing a southern urban extension between the southern urban edge of Norwich and the A47 (which presents a logical definable boundary). The land area appears sufficiently large to accommodate the 4500 homes (and necessary infrastructure) planned and would be better related to the services which Norwich provides. The new residents' day-to-day needs could be served by a holistic centre, anchored by the existing Harford Bridge store, and the existing bus services (which currently run as far as the park and ride at the A1401A47 junction) could transport people to and from the city centre. It is unlikely that a 'new town' of this size could provide the necessary amount and variety of services to enable it to become quasi self sufficient - it will almost certainly cause unsustainable travel patterns.</p>	
7132	<p>Thorpe and Felthorpe Trust We welcome the inclusion of the North East of Norwich as a location for major growth in all 3 options. It is considered that this area provides the most sustainable location for such growth due to its proximity to the City Centre and its potential to support self-sufficient communities. In addition, we welcome the recognition of the capacity of this area to deliver and support 6000-10,000 new homes, a new district and local centres (to support 'walkability' within the neighbourhoods) and complementary social infrastructure including a new school as well as improving and promoting more sustainable modes of transport and movement. The North East Sector is described as the Sprowston/Rackheath area, however, it is acknowledged that in Policy 5 it states that the 'broad locations' have been identified. For the purposes of this consultation and our response, we assume that this includes land from Wroxham Road to the A47 Postwick junction.</p>	



7151	<p>Savills INTRODUCTION AND BACKGROUND</p> <p>1.1 Savills are acting on behalf of a number of parties with land interests in North East Norwich:</p> <ul style="list-style-type: none">• Mr R E T Gurney• Mr R Dashwood• Mr G Tuddenham• Mr & Mrs J Faircloth• Mr & Mrs D Smith• Mr & Mrs J Baker <p>1.2 Our clients' landowners are committed to working in partnership with GNDP and other partners to deliver a major, mixed use urban extension to the North East of Norwich.</p> <p>2.0 REPRESENTATIONS ON SHLAA</p> <p>2.1 We welcome the identification of our clients interests as part of the SHLAA, namely the:</p> <ul style="list-style-type: none">• BDC0131 land adjacent to Grange Farm Bungalow, Salhouse Road• BDC0135 land adjacent to White House Farm, Salhouse Road• BDC0136 land adjacent to Grange Cottage, Salhouse Road• BDC0140 land adjacent to the Georgian Leisure Club (Hotel), Salhouse Road <p>2.2 These sites are located within the broad area for a potential urban extension to the North East of Norwich. We support this as a location for a major sustainable urban extension to contribute toward meeting housing needs in the over the plan period and beyond. Major development at this location will enable the planning and delivery on a comprehensive basis of the infrastructure needed to support growth.</p> <p>Designations</p> <p>2.3 There are no designations within the area which prevent major development. There may be a number of sensitive parts within the broad area, but a comprehensive masterplanning and design solution will ensure these areas are not adversely affected by development.</p> <p>Accessibility</p> <p>2.4 The sites have good accessibility with the potential for High Quality Public Transport to be enhanced through development of the area. Development of our clients land can assist in delivering a new inner link road connecting Wroxham Road to the Broadland Business Park so enhancing connectivity.</p> <p>Infrastructure</p> <p>2.5 Our clients and adjoining landowners acknowledge the need for new infrastructure to support the growth of the city, including those identified</p>
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	<p>by the Council, which relate to the need for new transport, social and utility/service infrastructure.</p> <p>2.6 Such infrastructure includes facilitating the completion of a new inner link road from Wroxham Road to the Broadland Business Park so enhancing connectivity.</p> <p>2.7 Coordination of a range of public and private sector organisations will be necessary in order to deliver the infrastructure required.</p> <p>Availability</p> <p>2.8 Our clients land holdings are suitable and available for development. They have the potential to facilitate the inner link from Wroxham Road to Broadland Business Park and make an early contribution to development needs.</p> <p>Additional land</p> <p>2.9 In addition, we request that the land south of Salhouse Road, identified on the plan at Annex 1 also be included within the SHLAA. This land amounts to some 6.69 hectares and is suitable and available for development.</p> <p>3.0 CONCLUSIONS</p> <p>3.1 It is considered that these sites are in an appropriate location to accommodate a substantial proportion of housing growth planned for Norwich and its hinterland as part of a sustainable urban extension to North East Norwich.</p>	
7176	<p>Felthorpe Parish Council A few months ago, Felthorpe Parish Council was asked to propose possible areas for development within the village for the purposes of the LDF. The sites were highlighted as possible for 'limited development'. Could you please confirm whether these have been received?</p> <p>Also, Councillors wish for Felthorpe to be classed as 'Other Villages' in the Spatial Hierarchy, as several other similar villages are. (i.e. Barford, Foulsham, Hevingham etc.) Please confirm that is, or will be, the case.</p> <p>Councillors feel it is important for these matters to be addressed now, if not then Felthorpe could be left out of future plans altogether, and the village would stagnate.</p>	
7227	<p>Salhouse Parish Council Salhouse Parish Council Response to GNDP Joint Core Strategy Technical Consultation August 2008</p> <p>Salhouse Parish Council have discussed the significance and impact of the GNDP Joint Core Strategy proposals. We have completed the on-line response form, but have not included any 'evidence', either because many of the points are self-evident or else there is no evidence immediately available to us without considerable research.</p>	



Overall, Salhouse Parish Council is not satisfied with the proposals contained within the Joint Core Strategy document because of (1) the lack of real options for people living on the NE edge of the city, and (2) the number of inconsistencies within the document and poor definition of some of the key proposals.

Salhouse Parish Council considers that any large scale development in adjacent parishes (Rackheath and Sprowston) will have an impact on Salhouse and will therefore need to come under scrutiny.

The following are our additional comments on the Technical Consultation.

1. We feel that while the GNDP Core Strategy is being marketed as a joint plan for the three districts of South Norfolk, Norwich and Broadland, the distinction, from an early stage in the document, between the 'Norwich Policy Area' and the remainder of the GNDP area paints a picture of a two-tier strategy, whereas the main reasoning for the plan is that of a single joint strategy. We further feel that the distinction between the NPA and the remainder of the GNDP area is poorly explained or defined in the document text. We suspect that the NPA is in fact a 'wish-list' of parishes for a tentative expansion of Norwich City Council's boundary which underlies their application for Unitary status, and therefore conflicts with the interests of the GNDP as a whole. Salhouse Parish Council is rather surprised at the late inclusion of Salhouse within the Norwich Policy Area, as there is clearly a conflict between the various maps which show Salhouse either 'in' or 'out' of this area.

2. We note considerable confusion within the document as a whole regarding the total numbers of new homes to be built, this ranges from 24,000 to 40,000 without adequate qualification, on various pages of the document. This requires clarification.

3. The table in section 1.11 and Appendices 1, 2 & 3 show few options for either Broadland or Rackheath/Sprowston, the description and number of houses to be built is virtually the same for each Option, leading to the conclusion that there is really no option at all for residents of these areas.

4. The Policy document as a whole identifies a settlement hierarchy in which Salhouse is in the 5th tier, Service Villages, and sets the scene for scaled development based on this hierarchy. However, Section 7, Policy 1, Settlement Hierarchy, describes a different hierarchy in which the Norwich urban area and fringe parishes are categorised together and a new category "Major mixed-use developments in specified locations within the Norwich Policy Area" is introduced without prior discussion. This appears to be a catch-all clause which conflicts with the settlement hierarchy concept previously defined and appears to open the door to major development without regard for the size of the host community. The potential locations for these developments is not discussed.

5. Section 7.1, Policy 2, Norwich Policy Area, describes:
"10,500 dwellings in the Broadland NPA comprising existing commitment plus at least an additional 2,000 dwellings on small and medium sites in



	<p>sustainable locations in the urban area, urban extensions and larger villages, and 6,000 dwellings in a large new community detailed below". There do not seem to be any details given below of this large new community.</p> <p>6. Salhouse is described as a Service Village where "Local shops and services will also be protected". It should be noted that these services are under threat and it is to be hoped they can be protected sooner rather than later, before they disappear altogether. Small scale employment opportunities are very few and the last potential employment site in Salhouse (the service station site) has recently been sacrificed to housing.</p> <p>7. Salhouse is a conservation area and adjoins and partly overlaps with the Broads area. Any development will have to be sympathetic to these two constraints. Also, any large scale development within adjacent areas (Rackheath/Sprowston) will cause increased leisure activity pressure on Salhouse Broad which may be harmful.</p>	
7257	<p>Les Brown Associates I refer to the above mentioned consultation document and on behalf of my client Norfolk Homes Ltd enclose a consultation response form completed in respect of organisation details. I have also briefly noted my comments under the sections on main towns and service villages. We note this Technical Consultation Document is based on a number of earlier technical studies on which there was no consultation and therefore it is difficult to input into those issues which have lead to the questions identified in the consultation document and associated response form. However we set out below our comments and associated suggestions/supporting information where appropriate.</p> <p>We generally support the proposed new housing locations identified in the table in paragraph 1:11 and hence have no views with regard to the 3 options identified in the first table. With regard to the areas for small scale development (the 2nd table in 1:11) for reasons stated later in this representation we believe Aylsham (which is identified as a main town) should be provided with an allocation in preference to the allocations proposed in Diss, Harleston, Acle and Reepham.</p> <p>We note and support proposals to provide for small housing developments in Blofield as this is a highly sustainable location, close to the Southern By-pass Norwich Fringe employment opportunity and public transport links.</p> <p>Trowse is conspicuous by its absence from any proposed allocation other than as a service village, it is in a highly sustainable locality with good public transport, within the Southern By-pass and close to the centre of Norwich and identified as part of the Urban Fringe confirmed in Section 7 Policy 1 and Policy 8. However Policy 8 identifies Trowse as a service village where in fact compared to the other listed service villages Trowse is very close to the edge of Norwich and is in a more sustainable location than any others listed in Policy 8 being within walking distance of County Hall and nearby amenities and public transport. For these reasons is at odds with all other settlements listed in Policy 8. Trowse should be included as part of Norwich as it is well placed to accommodate more development than the modest limit provided within the proposed policy.</p>	



	<p>Turning now from the NPA and Norwich Fringe to Main Towns (Policy 6). As mentioned above we are of the view that Aylsham is worthy of further consideration to accommodate more than the modest additional growth proposed.</p> <p>The settlement of Aylsham appears in the Technical Consultation to score very highly in all areas but for foul water disposal constraints. Our clients have considered the water cycle study by Scott Wilson and would comments as follows.</p> <p>A.nglian Water confirm there is currently spare capacity for some 400 additional dwellings in Aylsham but indicate they would be happy to increase this volume if the E.A. agreed the impact on the receiving environment. Unfortunately the Stage 2a Water Cycle Study has only considered specific volumetric capacity at WWTW's which creates a problem for Aylsham. Assessment of special treatment process capacity constraints at the relevant WWTW's will be undertaken later in the Stage 2b Study. Bearing in mind Aylsham ranking 5 out of 8 on upgrade costs the town clearly warrants a Stage 2b Study which we feel would improve its ranking further and certainly place it ahead of other settlements such as Diss and Acle.</p> <p>The conclusion of the Stage 1 WCS was that there was no current growth potential at Aylsham however AW are indicating spare capacity of 400 units and this inconsistency alone places Aylsham in a position where it warrants further detailed investigation as a "Main Town" which could accommodate further estate scale developments.</p> <p>Our view that Aylsham should be given additional consideration for larger scale estate development is further justified by reference to the tables 5.5.1 and 6.1 when compared with Diss and Harleston in Policy 6 and Acle, Reepham and Wroxham in Policy 7.</p>	
7267	<p>Barton Willmore Phillip Jeans Homes support small scale development at Loddon for approximately 100 - 200 dwellings and consider that the site at George Lane (Appendix A) is a wholly appropriate location to accommodate this proposed growth.</p> <p>2.2 The site has the following features and benefits:</p> <ul style="list-style-type: none"> • 15 hectares (approx) • Potential capacity for 100 20G dwellings or more • No evidence of protected species • Direct access to a main radial route (A146) to Norwich City • Located within the Key Service Centre of Loddon • Excellent access to local facilities and services including schools and health services • No landscape or environmental designations of national significance • Well established boundaries • Immediately abuts existing residential development • Existing local services and existing infrastructure provide immediate capacity for new residential development • Affordable housing provision in accordance with policy requirements will help meet local housing needs for Loddon. 	



	<p>2.3 This site is available and can be quickly and easily developed in the shorter term. It is available to provide housing supply in the interim period during the planning timescale required before housing completions can be delivered by the larger sites. Small scale development at Loddon as identified in the Technical Consultation is wholly supported and the George Lane site is considered to be the only logical and sustainable site in Loddon for facilitating this growth in a comprehensive and timely manner.</p>	
7294	<p>Breckland District Council</p> <p>As an adjoining authority to the Greater Norwich Development Partnership (GNDP) the Council welcomes the opportunity to participate in the Technical Consultation and share some evidence that has emerged as a result of the preparation of the Breckland Local Development Framework Core Strategy. In particular the strategy in Breckland to focus significant development along the A11 corridor at Attleborough, Snetterton and Thetford needs to be co-ordinated with the emerging options for strategic growth in the A11 corridor covered by the GNDP. The issues of energy supply and transport networks on the A11 and A47 corridors are of principal concern to Breckland.</p> <p>The principal issue relates to co-ordination of growth along the A11 corridor and the requisite infrastructure availability to support the cumulative growth in the GNDP area and adjoining growth locations in Breckland. You will see from our submission that we refer to an A11 Energy Study which when finalised (within the next 2 weeks) we will be happy to circulate to the GNDP as evidence base.</p> <p>The following comments are provided in order of the issues/questions raised in the document.</p> <p>Pages 14-15: Key External Linkages</p> <p>Breckland Council welcomes the recognition under section 4.4 that there are key external linkages from the Core Strategy area along the A11 corridor, including significant growth at Attleborough and Thetford. The Council also welcomes the acknowledgement that the Brecks are an important visitor attractor but seeks clarification on what is meant by the statement the Brecks have "further potential". This element of the Joint Core Strategy should be subject to Appropriate Assessment to ensure that the recreational and visitor impact of growth in the Core Strategy area does not have an adverse impact on the European habitats in the Brecks. Breckland has developed a significant evidence base around visitor and recreational impact on The Brecks and would be able to provide this evidence base to the GNDP to enable the Appropriate Assessment to be completed.</p>	



7302	<p>CPRE Norfolk CPRE Norfolk responds to the 'content' of the position statement in two parts. The first deals the formulation of the East of England Plan, adapted on the 12th May 2008, which forms the framework within which the Joint Core Strategy is progressed. We then move on the need for how changes over the past year, and particularly in the last few weeks, make it imperative for a re-alignment of approach and assumptions to be considered by the GNDP in the further progression of the Core Strategy.</p> <p>The East of England Plan and the GNDP Core Strategy.</p> <ol style="list-style-type: none">1. The Plan was driven by central Government seeking very high levels of housing growth for the East of England Region (and the greater south east as a whole). The principal justification was the statistical demographic projections for population and household growth.2. Large increases in population were derived by extrapolating the most recent five year level of international net in-migration to 2021 and beyond. This was at a historic high, and a departure from the previous practice of using both 'short term' (five year) and 'long term' (twenty year) trends as a basis for the projections.3. Average household size was projected to fall from 2.42 to 2.19 between 2001 and 2021 (ODPM 2003), a major factor being an increase in single occupancy. For any given population number this will result in an increase in the number of households, and from that an increase in the number of dwellings planned.4. The progression of the region plan was carried out against a background of a series of Government changes in the planning system. During the Examination-in-Public (November 2005-January 2006) there emerged the Growth Point concept; and one week before the main session for Norfolk (held on the 15-16th December 2005), we saw the revisions being made in moving from PPG3 to PPS3, the Government planning policy statement for housing. These were designed to make planning policy more in tune with market demand, and saw the removal of the 'brownfield first' sequential approach.5. The need for an increase for greater provision of affordable housing was recognised by Government, Local Authorities and many other bodies, not least CPRE. The CPRE divergence in view came on the financial route to provision. It was predicated on a very heavy reliance on 'planning gain'. For the larger developments, the permission would entail 30-40% of the total being made over as affordable housing. Past experience had been of the order of 15-20% in practice, and the system was only financially viable off the back of a sustained rising housing market and house prices.6. Just before the start of the E-i-P, Breckland 'broke ranks' amongst the Norfolk councils and requested an increase in housing provision from the 11,200 of the draft region plan consultation to 15,200 (2001-2021). The justification for this was the pressing need for affordable housing. At the
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E-i-P their proposal was for growth at Thetford with 6,000 new dwellings giving an increase of 50% in the housing stock; the bulk of the remainder was to be accommodated by the larger market towns.

7. During the E-i-P, Norwich volunteered an increase in their planned housing provision from 10,600 dwellings to 13,000, which again was accepted by the Inspector, but this time with a further addition to 14,100. The revision was due to a strong upward trend on the utilisation of brownfield sites over the previous 4 years, helped by the more favourable PPG3 and the demand for apartments in the city. Also North Norfolk requested a move from a 6,400 provision to 8,000 because the level of build and planning permissions gave little room for affordable housing from planning gain within 6,400.

8. Broadland remained at 12,200 and South Norfolk at 11,200 dwellings for the period 2001-2021. The provision for the Norwich Policy Area became 33,000 dwellings, including the larger part of the Broadland and South Norfolk allocations. This has been translated to some 47,500 new homes in the Greater Norwich Area between 2001 and 2026, and taking account of build and permissions since 2001, means that locations for a further 25,400 houses have to be identified from now to 2026.

9. A settlement of 1000 dwellings in the north east sector (Rackheath area) in the draft consultation region plan had increased to some 7,000 houses at the E-i-P. It was apparent by this time that the major driver for a large settlement was to bolster the case for the NDR, looking for trade off for housing growth as a route to seeking future support for finance for infrastructure provision. The GNDP consultation now offers the three options 1, 2 and 3 for Rackheath; but each is for 6,000 dwellings.

10. The Government accepted the figures and recommendations for the Norfolk supplied by the Inspector, but added some additional points affecting the whole region. All figures for the district councils should be treated as minimum figures, not target figures. The build rate for the last five years of the Plan to 2021 (the planned highest annual rates) could be extrapolated to 2026 for infrastructure planning and bidding for finance purposes. The GNDP have interpreted this as an authority to plan to 2026 for housing provision. In approving the final version the Minister said that a review of the Plan would commence 'as soon as the ink is dry'.

11. The GNDP 'Position Statement' says (paragraph 3.5): 'The East of England Plan is already being reviewed and is due to be completed by 2011. It will take account of updated household forecasts and look to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty'. CPRE Norfolk argues that the economic and social assumptions underlying this statement should be challenged, in addition to considering the pressures on the Norfolk countryside and its natural resources.

The Review of the East of England Plan and the GNDP Core Strategy

12. There is an urgent need for a Review of the East of England Plan, and with it the emerging Core Strategy for the GNDP; albeit not for the reasons the Government had expected. The current turmoil in the



housing market is unlikely to be short-lived; it is likely to have a major impact on the basic tenets underlying the housing policies and planned provision.

13. A decade of rising house prices and a buoyant housing market was expected to continue into the future. However it is very likely that for the next two or three years at least there will be a sharp reduction in the number of housing starts and the build completions. Land allocations and planning permissions are likely to be 'moth balled' until the market recovers. In the interim period there will be little open market housing built; it will be restricted to small scale development, which has no affordable housing element as a condition on the planning agreement, and in attractive locations.

14. When the market does start to recover, house-builders will not be in a position to deliver 30-40% of affordable housing. They will negotiate the level down or delay any building at all.

15. Even in a buoyant market it was overly optimistic to expect the developer to make large contributions to the cost of a Northern Distributor Road or a Long Stratton bypass, and support affordable housing to a level of 30-40% of the total housing mix.

16. We add also that in the case of Rackheath that the site location for 7,000 new dwellings does not match well with the main centres for planned strategic employment sites; and that new housing should be sited to make maximum use of existing infrastructure, rather than be located elsewhere in seeking to support the case and finance for new infrastructure. Similarly for Long Stratton, the options for housing are little or none (no bypass), 2,000 new homes, or 1,500 new homes.

17. The combination of the changes brought about by PPS3, the allocation of large supplies of land, and an economic downturn, will see a selective building outcome within a much reduced overall level of build. Large and very large scale housing development, even in prime locations such as Wymondham, are likely to fall a long way short in the implementation of the desired levels of affordable housing.

18. For Wymondham we make two specific and key points. Consideration at this time of a planning application for 3,000 houses is wrong in principle. It pre-empts the process to achieve the wider framework of the GNDP Core Strategy, a process in which this consultation is an important step. Secondly, this aside, CPRE strongly objects to this application. The scale of the proposal in relation to the size of the town is unacceptable. It will destroy the character of the town and its setting. The historic and attractive town centre will be swamped will be diminished by a sea of new development and 192 hectares of valued countryside will be lost. In addition we have little confidence we will see significant improvements in design, integration and sustainability standards over the volume market housing we have seen for decades.

19. There will be little interest in building on brownfield sites in Norwich with an abundance of greenfield land allocations on the outskirts of the city. The increases in housing numbers introduced at the E-i-P are likely to end up on greenfield land elsewhere in the Greater Norwich Area.



	<p>20. The most immediate need for the GNDP is to revise the expected average annual build rates for the period to 2021; retain some flexibility in the phasing of start dates when making allocations for new build; and lobby central Government for more finance for affordable housing, principally social housing. Unless this happens, the growing diversion between need and supply for social housing will get much worse than it is already. Increased support in this respect from central Government would also help the construction industry through a difficult period.</p> <p>21. The slowdown in the housing market should be used to plan more thoroughly and make serious efforts to raise the standards for housing as regards aesthetics of design and landscaping, the incorporation of energy and water conservation features in the home, the modes of transport that the new (and existing) residents will use.</p> <p>22. There is a need to reconsider the timescale, if not the longer term financial viability, of major infrastructure schemes dependent on developer contributions. This applies particularly to the NDR. Alongside this the viability of large scale housing development at Rackheath (and see point 16 above) must be reviewed, along with the environmental consideration as regards the location.</p> <p>23. We suggest such issues arising from the dramatic changes in the housing market and economy as a whole, need to be addressed in the GNDP draft Plan to be consulted on in April-May 2009 (the footnote to the date says 'assumes no significant additional evaluation or modelling requirement'; we consider that there must be).</p> <p>24. In parallel, we consider that there is a need for central Government to re-assess the assumptions upon which the long term forecasts for household growth in the UK; and how this would relate to the projected housing provision figures in the East of England Plan to 2021; and beyond that to 2026 and 2031.</p>	
7310	<p>Friends Family and Travellers (Planning)</p> <p>FFT is pleased that provision will be made according to the pitch requirements set out in Policy H4 of the RSS Single Issue review. However we do have concerns about some details of Policy 14:</p> <ol style="list-style-type: none">1. The limit on site size is arbitrary and runs counter to advice contained in Circular 1/2006 which states that 'setting a maximum number as a blanket policy is arbitrary' (p.22).2. The linkage of sites to main routes does not clearly understand the needs of Gypsies and Travellers and site search should be wider and not constrained by these routes. Formal transit sites may be best located in relation to major routes but this does not make sense for residential sites or for a network of stopping places. The SW Single Issue EiP Panel Report (April 2008- available on GOSW website) stated that the policy for locating Gypsy and Traveller sites should follow that proposed in the RS S for affordable housing and the policy for Gypsies and Travellers	



	<p>proposed here should follow this advice. Policy H4 should make this clear.</p> <p>3. The policy makes no mention of the separate and distinct needs of New Travellers in particular. The SW Single Issue EiP Panel Report is again pertinent. It said (p 64) that 'further consideration therefore needs to be given to ensuring that a network of temporary stopping places are provided nationally, in addition to permanent and residential pitches, so that the wider needs ... can continue to be met both now and into the future.' In our view there is sufficient information to make a start on both formal transit sites and also on stopping places. Leaving this issue until further need is identified and without stating when that need will be identified will run counter to one of the aims of Circular 1/2006 - 'to recognise, protect and facilitate the traditional travelling way of life of gypsies and travellers..' (p 5). The policy should clearly state that these needs will be met within the plan period. If there is a need for further work then the development of a joint core strategy presents an ideal opportunity to consider these issues and gather more evidence as a matter of priority.</p>	
7311	<p>Norwich Green Party</p> <p>This is a follow up to the very detailed response to the Joint Core Strategy 'issues and options' consultation submitted by the Green Party Group on Norwich City Council in February 2008. In that we questioned the assumptions behind the projected level of growth and argued for a 'more measured and cautious strategy for development'. It perhaps comes as little surprise that, in the current Technical Consultation, the fundamentals of the strategy are basically unaltered and the many questions raised by us and others as to the wisdom and necessity of this level of growth have so far gone unanswered. So the bulk of our original comments still stand and the main points can be summarised thus:</p> <p>i) Population growth in line with the projected UK average and current levels of growth in the Norwich area would produce a population figure of between 260,000 and 265,000 for the Norwich Policy area, not 280,000 as is claimed. This would discount roughly one-third of the projected growth in the Joint Core Strategy.</p> <p>ii) The projected rate house building is faster than demand would dictate (the figure of a 4000 surplus provided at the time would no doubt now need revision in light of the sustained downturn in the housing market)</p> <p>iii) The strategy fails to acknowledge the fundamental contradictions between environmental sustainability and the suburban/road-reliant nature of the envisaged housing development.</p> <p>iv) Support from central government for infrastructure funding is, at best, far from certain (the worsening economic situation since then would seem to make sufficient funds even less likely to be forthcoming)</p> <p>v) Spatially efficient forms of housing such as flats and terraces should be prioritised as being both more environmentally desirable and more likely to meet future patterns of demand. Encouraging better use of existing stock and encouraging shared residence should be an integral part of the strategy.</p>	



- vi) The chosen option of 'large scale urban extensions and new settlements', while being preferable to dispersed growth or more numerous sites of medium concentration, still basically amounts to an assault on the chosen area(s) ecology and should be minimised in its scope
- vii) Talk of an 'enhanced environment' with protected spaces between settlements is unconvincing, particularly when substantial post-2026 growth is envisaged
- viii) Proposals for zero carbon developments need a greater level of commitment and that, at the very least, developers should commit to providing 30% of energy usage from renewable sources (see item 54 in the SPD 'Energy Efficiency and Renewable Energy') and that non-biofuel renewables should generally be the chosen option
- ix) Further development should be only be undertaken with across the board reductions to an average domestic consumption of 110 litres (Policy WAT1, Environment Agency)
- x) The strategy must acknowledge the loss of water sources and agricultural land and increased flood risk likely to result from the rise in sea levels as a result of global warming. In particular, the loss of valuable farmland to development must be questioned.
- xi) Many of the proposed areas for development include valuable natural habitats of which many are protected under current planning policy. While the need for green links/corridors is acknowledged it is hard to see how this is compatible with this scale of development and an expanded road network
- xii) The emphasis on promoting the heart of Norwich as a retail centre threatens the viability of creating new 'town centres' in the proposed settlements.
- xiii) The economic importance and potential for growth in small scale manufacturing should be acknowledged in the strategy.
- xiv) Using house building as an economic stimulus, as well as being environmentally questionable, will tend to create jobs in low/skill service sectors.
- xv) Existing areas of deprivation should ideally receive the greatest economic benefit from any development and the growth agenda should not divert resources away from tackling existing problems.
- xvi) Greater economic diversity and local ownership of businesses should be encouraged with particular support for those adding environmental value.
- xvii) Grouping housing and employment together, while of course desirable, would necessitate a more stable and localised economy to be part of an effective strategy. The environmental constraints of some of the proposed development areas would seem to preclude the delivery of



	<p>adjacent 'new employment sites'.</p> <p>xviii) Improved railway provision and bus services should be prioritised over major road building with options left open for more imaginative solutions such as trams. For example, serious consideration should be given to opening a station at Dussindale that would serve housing developments in that area and also Broadland Business Park.</p> <p>xix) The appropriate level of investment will not be possible with such large sums devoted to the NDR. The strategy does not demonstrate the required measures or commitment to achieve a modal shift away from car use. The NDR itself is an inappropriate, expensive and environmentally destructive scheme completely at odds with the need for carbon reduction. This is demonstrated by the carbon emission figures from the business case recently made to Government for the NDR: Norwich's transport emissions go up from somewhere around 370,000 tonnes/year at present to 582,000 in 2071 ie a 57% increase whilst NDR (scheme related) emissions go up from 24,631 tonnes/year to 69,286 ie a near tripling. This is unacceptable when the Government is already committed to a 60% greenhouse gas reduction target by 2050 and may soon be setting a stronger target of 80% reduction by 2050 under the Climate Change Bill.</p> <p>xx) The idea that Norwich Airport should be a focus for growth is similarly contradictory from a carbon perspective.</p>	
7317	<p>Norwich Green Party</p> <p>The following is a summation of some of the issues which developers will face in each of the areas considered for major growth:</p> <p>North East Norwich. 6000 houses in the areas of Sprowston, Rackheath, Thorpe End & Salhouse</p> <p>15. I would like to refer here to the 'Vision Statement for North East Norwich' as produced by Bidwells and Savills in February 2008 as this is the most complete statement to date of developers' intentions. It also provides a revealing insight into how existing planning policy may be reinterpreted under the Joint Core Strategy. This document is at least more honest about potential environment/growth contradictions, stating that 'This will require resolution of the sometimes conflicting issues of addressing local environmental concerns, other sustainability objectives and the need for effective delivery of the planning strategy through implementation of the proposed development'. In places, the vision comes across very much as a 'developer's charter', preferring that 'one particular sustainable objective (eg. Environmental protection) does not happen at the expense of other objectives (for instance social and economic progress)'.</p> <p>16. Large parts of this area are characterised as ancient woodlands or historic parks and gardens and are protected under existing policy ENV10. In the proposals, however, they are designated as 'Areas of Restricted Development'. It is stated that development on these areas would be 'unlikely', yet we already know that the proposed NDR directly</p>	



	<p>borders one such area (to the West of Rackheath) and goes straight through another (Beeston Park). All of this begs the question of just how protected these areas are, particularly when post 2026 growth is contemplated.</p> <p>17. Other areas are currently restricted from development through designation as 'Area of Landscape Value (ENV5)' and yet, in the Vision Statement, are reclassified as having 'Potential Development Status'. This latter category does, however, also include County Wildlife Sites and current open space and recreational areas. It is rather bizarrely stated that development in these areas might be permitted to 'achieve sustainable outcomes' which further divests the term 'sustainability' of any consistent meaning.</p> <p>18. In a slight departure from the intentions of the 'issues and options' area designations, the area circled for 6000 houses in the Technical Consultation includes what was previously Area 2 but also the northern section of Area 3 (to the north of Salhouse) on the outside of the projected NDR route. One might presume that the extent of development in this area has been increased as the Joint Core Strategy has effectively incorporated the eco-town concept, previously intended for Coltishall, yet this is not stated.</p> <p>19. The above mentioned Vision Statement does place slightly more emphasis on 'low and zero carbon buildings' and yet, like the Technical Consultation, still makes no firm commitments. It also talks of designing 'walkable neighbourhoods', yet the 'interlocking villages' concept espoused for the area in the Technical Consultation seems to suggest a more dispersed, and therefore less pedestrian orientated, pattern of settlement. It is also difficult to understand how 'permeability and community integration across the NNDR' is going to work in practice. The NNDR will unavoidably denude the whole character of any adjoining settlement, not to mention protected open space.</p> <p>20. The Technical Consultation envisages 'stepping stones' of reclaimed heathland linking 'Mousehold Heath to the surrounding countryside'. For stepping stones to be effective, the distance between them has to be kept to an absolute minimum. There is also the point that for heathland to be self sustaining and of true biodiversity value, it needs to cover a relatively large uninterrupted area. There is already an extensive built up area between Mousehold Heath and the countryside with no such large unused open spaces. Further, to avoid building on the 'Restricted' areas, development would have to be partly concentrated to the south-west of the proposed development area and thus directly border the present outer boundary of the city. This would effectively make the stepping stone concept, at least as a link with Mousehold Heath, unrealisable.</p>	



<p>7329</p>	<p>Norwich Green Party</p> <p>West': Costessey & Easton, Options 1 & 2: 2000 homes. Option 3: 1000 homes.</p> <p>35. This largely appears to include land bounded by Bowthorpe to the east and the A47 to the west. Some of this has already been designated for housing growth to which we have no objection but the south of the area appears unsuitable for development being both part of the Bypass Landscape Protection Zone and the Yare Valley. Present policy clearly and place-specifically precludes development here and we would question why it has been considered as an option. Other areas in the North and West of the area at present form part of the 'green wedge'. Woodland immediately to the north of the Dereham Road and the A47 to the West with its attendant protection zone would appear to act as further barriers to development. The protection zone has, for the last 15 years, served the role as defined by the Structure Plan Panel of preserving 'those attributes of the City's natural setting which contribute to its environmental quality'. It is important that this laudable aim is not overridden.</p> <p>36. Although road transport links are good for this site it is important to note it is some distance from railway access</p> <p>Conclusion and Final Comment</p> <p>37. We believe that the constraints and undesirability of large scale development on all these sites further strengthens our case that the proposed housing growth is simply on too large a scale. We have demonstrated that, in so many locations, developments would either threaten biodiversity or destroy the setting and context of Norfolk's natural heritage. Proposed green corridors would be, from a spatial point of view, next to impossible to reconcile with the demands of new road construction and dense settlement apparently needing further capacity for post-2026 expansion. We hope the recent and continued severity of the housing downturn which, coupled with the realisation that the current recession may prove a longer term economic corrective preventing a return to credit-driven boom, will cause both local and central planners to have a more sober, measured and sensitive approach to development. In short, if those in government don't make this adjustment, then it is highly likely the market will do it for them.</p>	
<p>7343</p>	<p>Watsons Percy Howes</p> <p>This practice has received the attached letter and will attempt a considered joint response to some of the issues by senior surveyors in this office.</p> <p>What I am now going to say is probably absurd now that the airport is not in the joint ownership of the City and County, and maybe if I was keen to</p>	



	<p>give time to the matter and read the Title documents on the Land Registry I could answer some of these points for myself.</p> <p>Locations for further 25,400 dwellings have to be identified in Norwich and the surrounding area. Norwich airport is less than ideal in terms of its location. Airport operations in Norwich have to take account of the impact on residential amenity and there is an agreed operating policy which restricts the use of the airport for about seven in every 24 hours.</p> <p>I no longer have figures for the surface area of the airport at my fingertips, but I would have thought that if the airport in its present location was closed, land released would be sufficient to accommodate at least a further 6,000 dwellings.</p> <p>In terms of optimal interchange potential there is land adjoining the railway line on the east side of Wymondham, where a new airport would be better located.</p> <p>As I say, whatever may be the sense of relocating the airport, the opportunity has probably been lost. Certainly at the time that David Turnbull was chairman of the airport company and Steve Parsons the managing director, the possibility of relocation was not well received, and it was regarded as over ambitious and extravagant in the way that it would squander the buildings and other valuable infrastructure investment already made in the area.</p> <p>It didn't help at the time for there to have been a considerable lack of surface water drainage capacity in the existing system and the probability that a surface water drain would have to be installed from a position close to the existing airport terminal to the nearest carrier which runs under Spixworth bridge. The beauty of the scheme would be that the proceeds of sale of the airport land would be considerably in excess of the cost of relocation and the rebuilding of the hangars and other facilities which existed at the time.</p> <p>Not forgetting opportunities arising from the completion of the NDR</p>	
7344	<p>Mr A Shirley</p> <p>1. INTRODUCTION</p> <p>1.1. In a letter dated 1st August 2008, the Greater Norwich Development Partnership Manager invited Brown & Co to participate in a Technical Consultation in connection with the preparation of the Joint Core Strategy. Brown & Co, on behalf of The Hon. Andrew Shirley and Family, have requested that a response be submitted on the content of the emerging JCS with regard to the potential of Ditchingham to deliver elements of the proposed policy framework. Their land can make a meaningful contribution to the delivery of the new housing required in the Norwich area by virtue of Policies H1 and NR1 of the East of England Plan.</p> <p>1.2. Our clients agree with the comment at paragraph 13.68 of the East</p>	



of England Plan to the effect that the Norwich area has the potential to develop further as a major focus for long term economic development and growth. In the light of this policy perspective, it is important to ensure that the Joint Core Strategy provides a robust and flexible spatial strategy, capable of realising the potential of the Norwich area in the period to 2021 and beyond. The JCS should secure the base from which the necessary step-change in economic and housing delivery is achieved in the short/medium term whilst identifying a sound spatial policy framework for the longer term.

2. STRATEGY FOR GROWTH

New housing locations

2.1. Given that the Joint Core Strategy is being prepared by the Greater Norwich Development Partnership, our clients were initially concerned that the interests of the rural areas surrounding Norwich would be forgotten/submerged in the debate regarding the formulation of an appropriate planning framework for the Norwich Key Centre for Development and Change. Policy NR1 of the East of England Plan refers to the concept of the KCDC and requires a policy base capable of providing 33,000 net additional dwellings in the Norwich Policy Area in the period 2001-2021. However, Policy H1 of the East of England Plan plainly requires the provision of 37,500 dwellings in Broadland/Norwich/South Norfolk in the period 2001-2021. Given that context, our clients welcome the acknowledgement at paragraph 2.3 of the Technical Consultation that the three districts constitute "a diverse mixture of the city of Norwich, Market Towns, villages and countryside."

2.2. Paragraph 2.4 of the Technical Consultation outlines the objectives of the Joint Core Strategy, including the need to identify broad locations for new housing and employment growth "as well as defining areas where development should be limited." Given that approach, there is merit in the intention within the Technical Consultation to seek to identify an appropriate settlement hierarchy and the broad range of development deemed appropriate in Service Villages such as Ditchingham. Whilst the Joint Core Strategy places significant emphasis upon the expansion of the Norwich urban area, it is important for the document to provide guidance regarding the nature/scale/distribution of new development opportunities in the rural area.

2.3. We recognise that the rural area will not accommodate the level of growth required around Norwich but, given the context described at paragraph 2.3 of the Technical Consultation, it is important for the Joint Core Strategy to give consideration to a policy framework appropriate to the rural area.

3. THE SPATIAL VISION

3.1.

3.2. Our clients endorse the comment in the Spatial Vision regarding the rural area that the main towns, "key service centres and service villages will be focal points for communities to have better access to quality jobs, healthcare and education facilities and shops." Equally, our clients



endorse that element of the Spatial Vision which states that "Service Villages or Other Villages will maintain and enhance rural life by providing additional flexibility in the provision of sustainable housing and other small scale development, consistent with their form and character."

3.3. We have noted the observation at Objective 4 that the settlement hierarchy "defines the towns and villages with a good range of jobs, services and facilities." Given that proposition, we endorse the Settlement Hierarchy defined at Policy 1 of the Technical Consultation and the suggestion that the scale of development will decrease at each level of this hierarchy. In the light of the policy provisions contained in the East of England Plan our clients recognise that much of the new development in Greater Norwich will inevitably be focused upon the primary urban area of Norwich. Within that broader policy framework, however, Policy 1 of the Technical Consultation reflects the need to ensure that some development is assigned to other settlements within the area, such as the Key Service Centres and Service Villages.

4. POLICIES FOR PLACES

4.1. In the light of the content of Policies H1 and NR1 of the East of England Plan, our clients understand that the focus for major growth and development will be in the Norwich Policy Area which is defined at Appendix four of the Technical Consultation. We acknowledge the comment at paragraph 7.1 of the Technical Consultation to the effect that the EEP focuses growth on Norwich as a KCDC, "with lower levels of growth in other towns and key service centres. In a rural area it is also appropriate to identify smaller villages for local needs growth."

4.2. Our clients support the proposition contained at paragraph 1.10 of the Technical Consultation that "to deliver the planned housing growth large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area, is proposed." Whilst the Technical Consultation contains an understandable focus on Norwich, our clients support the fact that the role of the rural area is considered in the Technical Consultation and the settlement hierarchy proposed in Policy 1 envisages the distribution of some new development to settlements in the rural area.

4.3. Paragraph 3 of PPS7 notes that local planning authorities should focus most new development in areas away from larger urban centres at locations in or near to local service centres where employment, housing, services and other facilities can be provided close together. Such an approach is expected to ensure that such facilities are served by public transport and provide improved opportunities for access by walking and cycling. These centres, which might be a country town, a single large village or a group of villages, should be identified in the LDF as the preferred location for such limited growth. In the light of that guidance, our clients support the intention of the JCS to promote limited growth at Service Villages such as Ditchingham.

4.4. Paragraph 38 of PPS3 suggests that LDDs should acknowledge the need to provide housing in rural areas, not only in market towns and local service centres but also in villages in order to enhance or maintain their sustainability. This is expected to include, particularly in the context of



smaller rural settlements, consideration of the relationship between settlements so as to ensure that growth is distributed in a way that supports informal social support networks, assists people to live near their work and benefit from key services, minimise environmental impact and, where possible, encourage environmental benefits.

4.5. Whilst paragraph 3.10 of the East of England Plan notes that the main strategy is to concentrate development at the region's cities and other significant urban areas, including selected market towns, Policy SS4 of the EEP recognises the role that large villages can play in providing employment and services to their rural hinterlands and meeting housing needs. The East of England Plan recognises that many villages have limited local services but Policy SS4 considers that other rural settlements can accommodate housing for local needs

4.6. When these policy strands are taken together, particularly within the wider context provided by the identification within the EEP of Norwich as Key Centre for Development and Change, it is necessary for the JCS to provide a policy framework which enables new housing, albeit of a limited scale, to be provided in the rural area. That being the case, our clients endorse Policy 8 which identifies Service Villages which are expected to accommodate new housing as well as small scale employment or service development appropriate to the needs of the village and its immediate surroundings.

4.7. We have noted that it is proposed that the new housing development at Service Villages be restricted to a maximum of 20 dwellings. However, we would suggest that the general intent behind Policy 8 may be better served if it is stated that appropriate sites will be promoted for the accommodation of new housing and that the figure of 10-20 dwellings will not necessarily be used in an inflexible manner to prevent the co-ordinated/comprehensive development of a readily identified development site. Our clients recognise that it is not the intention of the JCS to direct significant levels of growth to the Service Villages but the particular wording of Policy 8 may prevent the development of coherent/appropriate sites. The accommodation of further housing will necessitate a careful review of the present Development Limits of Ditchingham.

4.8. Our clients consider that the wording of Policy 8 needs to be reconsidered in order to ensure that appropriate flexibility is retained to facilitate the development of new housing, of an appropriate scale, that is not constrained by immutable visual/environmental/transportation constraints. We note that paragraph 7.28 of the Technical Consultation anticipates that the Service Villages will provide 300-600 new homes "throughout the plan area to provide for limited housing growth to meet a range of local needs including affordable housing." Paragraph 7.29 further notes that the Service Villages might also be expected to accommodate small scale local employment opportunities to provide for the diversification of the local economy and local services.

5. HOUSING

5.1. We endorse the observation at paragraph 8.4 of the Technical Consultation that, in order to meet the obligation in PPS3 to establish a



	<p>15-year housing land supply at the point of adoption of a DPD, provision will be made in the Joint Core Strategy to provide a framework to accommodate housing in the period 2021-2026. On that basis, we acknowledge the observation in the table at paragraph 8.4 that there is a need to identify 'new' land to accommodate approximately 25,420 dwellings in Broadland, Norwich and South Norfolk in the period to 2026.</p> <p>5.2. Paragraph 3.5 of the Technical Consultation notes that the East of England Plan is being reviewed and "it will take account of updated household forecasts and look ahead to 2031. It will result in upward pressure on housing targets but at this stage cannot be assessed with certainty." It will be necessary for the Joint Core Strategy to establish a sound and sustainable spatial strategy, capable of accommodating/managing growth in the period to 2031. During that period, the housing provision figure will increase.</p> <p>5.3. The adopted East of England Plan requires the construction of 25,400 dwellings per annum in the period 2001-2021. The revised projections of households for the English regions to 2026, published by DCLG in February 2008, anticipate the creation of 29,160 households per annum in the period 2004-2029. This rate of change is almost 15% higher than the annual growth presently described in the East of England Plan. Furthermore, the report presented on 26th June 2008 to the Minister for Housing by the National Housing and Planning Advice Unit suggested that the review of the EEP should test an increase of between 30,600 and 39,200 dwellings per annum in the period 2008-2026. The upper end of the range identified by the NHPAU represents the number of net additions to the housing stock deemed necessary to address demographic factors, to meet the backlog of demand and to stabilise affordability. The Joint Core Strategy should be sufficiently robust to accommodate an increase in housing provision assigned in the review of the EEP to the Norwich Key Centre for Development and Change and the wider Broadland/Norwich/South Norfolk area.</p>	
7359	<p>Nathaniel Lichfield and Partners</p> <p>NORWICH, CHAPELFIELD: REPRESENTATIONS ON TECHNICAL CONSULTATION: REGULATION 25 DOCUMENT FOR JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH NORFOLK</p> <p>On behalf of our client Capital Shopping Centres plc (CSC) we are pleased to enclose representations on the recently issued Technical Consultation: Regulation 25 document for the Joint Core Strategy between Broadland District Council, Norwich City Council and South Norfolk Council forming the Greater Norwich Development Partnership (GNDP).</p> <p>CSC has a considerable interest in Norwich city centre and has been actively involved in its development since the opening of the Chapelfield Centre in 2005. CSC welcomes the opportunity to comment on the technical document and believes that it will provide a strong framework</p>	



	<p>for the future development of Broadland, South Norfolk, Norwich and its city centre.</p> <p>Section 5: Spatial Vision</p> <p>CSC strongly supports the spatial vision for Norwich city centre to build its importance in key economic sectors with a particular interest in ensuring that Norwich continues to be a UK "top 10" retail centre. CSC supports Objective 5 which seeks to encourage the growth of Norwich city centre so that the centre remains one of the best in the country for retail and employment. CSC welcomes the identification of a need for 35,000 new homes within the Norwich Policy Area between 2006 and 2026 and 33,000 new job across all areas. Access to good quality jobs and essential services needs to be a key consideration with correct investment at strategic and other employment locations to create a stronger economy.</p> <p>Section 7: Policies for Places</p> <p>CSC welcomes the identification of Norwich city centre as the focus for future retail development (Policy 3) which conforms with the hierarchy of centres identified in Policy 12 in accordance with PPS6. The recognition of an identified need for additional comparison floorspace in the city centre that could be achieved through intensification and expansion of the primary retail area is strongly supported by CSC. CSC is firmly committed to actively participating in the Joint Core Strategy and any other development plan documents providing the future strategy for Broadland, Norwich and South Norfolk. We would therefore be grateful if you would keep us informed of future progress up to and including the consultations on the draft plan next spring.</p>	
7360	<p>Coal Authority Thank you for consulting The Coal Authority on your Joint Core Strategy for Broadland, Norwich and South Norfolk. Just to confirm that The Coal Authority has no specific comments to make on this document.</p>	
7425	<p>Environment Agency (Eastern Area Office) (</p> <p>Thank you for submitting the Joint Core Strategy (JCS) Regulation 25 technical consultation document. We have considered the JCS and offer the following comments.</p> <p>5 Spatial Vision</p> <p>We generally support the spatial vision set out in this document, but consider the 'Climate Change and Sustainability' section to be lacking many key considerations. We recommend that four further criteria are referenced within this section:</p> <p>Water efficiency Could be included within the second bullet point since this links closely with energy efficiency and is integral to the Government's aims within the Code for Sustainable Homes (CfSH). This would also tie in more closely with spatial planning objective 9.</p>	



	<p>Water Quality Improvement of water quality is already a key consideration within the Greater Norwich area due to the presence of several Special Protection Areas (SPA), Special Conservation Areas (SAC) and Sites of Special Scientific Interest (SSSI) both bordering the City and further downstream within the Broads. This would also tie in more closely with spatial planning objective 8 and 9.</p> <p>Flood Risk The vision makes no reference to reducing flood risk in the JCS area even though this is a major environmental consideration to both new and existing development. With climate change the risk of flooding from all sources is expected to increase and given the degree of new growth and regeneration of existing urban areas that is required we strongly recommend this be included within the vision.</p> <p>Biodiversity The final bullet point could also seek the enhancement of existing open spaces and wildlife habitats to improve biodiversity as well as provide connections between these spaces. This would also tie in more closely with spatial planning objective 8.</p> <p>Spatial Planning Objectives</p> <p>We support objective 8 to protect, manage and enhance the natural and built environment. We would however, recommend that the sixth sentence be amended to include the text highlighted in blue "It is a priority to improve these special qualities even more for their own benefit and so that everyone can enjoy them". This change would emphasise the importance being placed on such areas not only as a utility for people, but also as an environmental resource.</p> <p>With regard to objective 9, we support the objective, but note that no reference is made to flood risk even though this is likely to be a major environmental factor that will need to be addressed over the lifetime of the JCS. We therefore recommend that flood risk be included, perhaps stating that appropriate siting, design and layout will be required in new development and mitigation to existing development will be investigated.</p> <p>We also note that "...to improve energy efficiency, zero carbon development will be investigated". This seems quite weak since zero carbon development is set to be a requirement for all new development by 2016, ten years earlier than the end of the JCS Plan period. We therefore recommend that this aim be strengthened to reflect the Government's policy aims and the stated spatial vision that "Zero carbon development will be the standard to be achieved..."</p>	
<p>7504</p>	<p>Bidwells Response to the Strategic Housing Land Availability (SHLAA)</p> <p>On behalf of Mr Green, Bidwells has already undertaken a considerable amount of technical work on the deliverability this site. It could therefore be brought forward swiftly for development, thus contributing to South Norfolk Councils 5-year supply of deliverable housing sites. The information contained in the SHLAA profile is accurate with the exception of the following:</p>	



	<ul style="list-style-type: none"> • Assumed capacity: 88 dwellings. The site will not be developed in its entirety with 2.2ha contributing to housing provision, providing 88 dwellings at 40 dwellings per ha The remainder of the site is likely to be provided for open space and/or recreation provision. • Access/ Safety: An initial assessment of the provision of a suitable access to the site was undertaken alongside the Transport Statement. A draft scheme was drawn up which the highways consultants are confident will meet the relevant highways standards. Informal discussions have already taken place with Norfolk County Council which has raised no significant concerns at this stage. • Release Phase: The size of the site and lack of constraints means that it is anticipated that this could come forward at the earliest possible opportunity (i.e. years 0-5) • Availability: It is not strictly accurate to state that the site is in single ownership with these representations being submitted on behalf of Martin Green and Norwich Consolidated Charities. However the two landowners are working jointly and the site is actively being promoted for development and can be brought forward quickly to deliver growth. 	
7505	<p>Greater Norwich Housing Forum The GNHP would like to take this opportunity to say that we are particularly impressed with the JCS and think that it represents an excellent direction of travel. If there is any further input that you would like the GNHP to offer, please let me know.</p>	
7509	<p>Keymer Cavendish By way of clarification, as noted in Section 6.0 of our submission document, we have only addressed the matters that we feel are relevant generally to the Core Strategy and, in particular, to our client's site. Our submission identifies the sections in the Consultation document to which we are responding. As stated in the submission, I apologise for the fact that the responses are not submitted under the 32 questions but this is difficult when we feel that none of the Options 1, 2 or 3 are correct.</p> <p>We understand that this Consultation runs in parallel to another on the Strategic Housing Land Availability Assessment (SHLAA).</p> <p>I understand that there has been consultation on a more technical level in respect of the above; for some reason I was not included on the mailing list for this. Nevertheless, I thought it appropriate to bring to your attention the continued availability of my client's land at Heath Farm, Thorpe End - a site amounting to 10 hectares.</p> <p>You will be aware that I have never proposed that this land should be promoted or developed in isolation but rather that it should form part of a string of development, linking housing to the Broadland Business Park to the south. This single carriageway eastern relief road running from the A47 through to the Wroxham Road could form an interim relief road pending the completion of the proposed northern distributor road (NDR).</p>	



	<p>However, this is not a highways-led scheme, as development is already allocated southwards from the Wroxham Road east of Blue Boar Lane and I understand that it will, in due course, work down to the Salhouse Road.</p> <p>Development of the Valori land and other land ownerships adjacent namely Fairclough to the north and Mr Barker to the south, would provide a missing link to assist with this.</p> <p>Vital to the sustainability of development in this location are:</p> <ol style="list-style-type: none">The good bus services running into NorwichThe easy cycling links to the Broadland Business Park where there is, as you know, extensive employment. <p>I am, of course, aware that the scale of the proposed strategic release in the area is far greater than the area I have identified, but I do feel that the early release of the scheme identified would assist in the early provision of a relief road. Once the NDR is built, this road would still maintain a function for the internal distribution of traffic within the city and would, of course, aid accessibility to the major employers at the Broadland Business Park.</p>	
7517	<p>Bidwells</p> <p>3.0 Concept Proposal</p> <p>3.1 The proposed use for the site is shown on the concept masterplan given in Appendix 1, consisting of in the region of 200 residential dwellings.</p> <p>3.2 The primary access to the site would be off Burgh Road in the form of a simple priority junction which would be located to suit the 30mph vision splay requirements given in Manual for Streets for both the vertical and horizontal planes.</p> <p>3.3 A non-vehicular link would be provided from Rippingall Road facilitating an alternative pedestrian/cycle link to the town, this access would also serve as an emergency access,</p> <p>3.4 It is recognised that with the additional vehicles from the development joining the existing junction of Burgh Road and the A140 that improvements would be necessary.</p> <p>1 0 Introduction</p> <p>1.1 This Transportation Statement has been prepared by Woods Hardwick Infrastructure LLP on behalf of Kier Land Ltd as part of their response to the Joint Core Strategy Technical Consultation and Strategic Housing Land Availability Assessment.</p> <p>1.2 Kier Land Ltd is promoting its site at Burgh Road in Aylsham, and believes it will be able to deliver approximately 200 of the 300 dwellings</p>	



	<p>sought for Aylsham.</p> <p>1 3 This Supporting Transportation Statement demonstrates that there should be no reason in highway terms why the site cannot be allocated.</p> <p>2.0 Existing Site</p> <p>2.1 The site, adjacent to Burgh Road, is located on the eastern edge of the Market Town of Aylsham in Norfolk, Aylsham is located between Norwich and Cromer and the A140 by-passes the town centre with three junctions for access into the town.</p> <p>2.2 The central junction is the A1 40/Burgh Road junction leading to the site.</p> <p>2.21 The site's southern boundary is clearly demarcated by the Bure Valley Railway and Path, with existing residential units to the west of the site on Rippingall Road. Fronting onto Burgh Road to the north and fields to the east and south east.</p> <p>2.22 There are established cycling routes that radiate from this area, namely Marriott's Way, Weaver's Way and the Bure Valley Railway • the narrow gauge railway station is at the western end of the road and the line follows the southern boundary of the site.</p> <p>2.23 The Bure Valley Walk runs parallel to the site's southern boundary and clearly has the potential for a pedestrian access to this side of the site, as indicated on the Concept Masterplan.</p> <p>4.0 Summary and Conclusions</p> <p>4.1 The site is located in close proximity to all of the Market Town's existing facilities, well within recognised walking and cycling distances.</p> <p>4.2 The site can be accessed satisfactorily from the public highway. The primary access being from Burgh Road with a secondary footpath/cycle link to Rippingall Road which could also provide emergency linkage.</p> <p>4.3 The existing A1 40/Burgh Junction will be brought up to standard for the benefit of both existing and generated movements from the site.</p> <p>4.4 There is no reason in transportation terms why this land should not be allocated for residential use.</p>	
<p>7526</p>	<p>Ministry of Defence The MOD has no specific comments to make on your strategy, but would ask that you bear in mind the need to give consideration to the potential development of MOD sites within the area should the requirement arise. You will be aware that the MOD only holds property to provide for or to support the front line military capability. Therefore, as a general principle, there will be a need to develop or enhance establishments to meet any new requirements of the Armed Forces. It is considered that where a site is used for defence purposes, development should be permitted, so long as it is necessary for such</p>	



	<p>purposes and is in keeping with the character and appearance of the site. There is also the possibility that over time we may need to rationalise MOD land and property holdings. As a consequence, brownfield sites may become available for re-development and allowance should be made for this within the Joint Core Strategy.</p>	
7549	<p>Mr Richard Atkinson</p> <p>This response is made on behalf of the promoters of development at Colney Lane, Cringleford - Barratt Strategic, the John Innes Foundation and Building Partnerships Since our initial representation to the Issues and Options document, which sought to promote the development of land in the south west of Norwich to the west of Colney Lane at Cringleford, we have given further consideration to the scale of development and mix of uses which could be accommodated on this site - the area is bounded by Colney Lane, the Colney Lane/Newmarket Road link, the A47 and the Norfolk and Norwich Hospital. We believe that this area can accommodate a mixed use development of around 2500 homes, together with an education and research park which can take advantage of the proximity of the Norwich Research Park and the Norfolk and Norwich Hospital. We believe that this proposal will be consistent with the aspirations of the emerging Joint Core Strategy and consider that it is important that it is brought forward as part of a strategic planned approach to the area endorsed by the key stakeholders.</p> <p>Aims</p> <p>We welcome the fact that the vision of the Strategy includes for investment at key strategic locations which include Colney, Cringleford and the Norwich Research Park. We also note the emphasis in the vision on delivering "safe, healthy, prosperous, sustainable and inclusive communities which will have involved development of well designed, good quality homes that meet people's needs and aspirations in attractive and sustainable places". The proposed development at Colney Lane would be consistent with these aspirations and would ensure that people have good access to good quality jobs and essential services.</p> <p>In our response to the Issues and Options document we highlighted how a housing-led Colney Lane proposal would meet the objectives of the Strategy. The education and science park will ensure that development at Colney will be yet more closely aligned with the emerging strategy. In particular it will make a greater contribution to achieving the objective "To promote economic growth and diversity and provide a wide range of local jobs".</p> <p>Critical infrastructure (Question 1)</p> <p>In accordance with sustainability principles we will be designing the development to minimize both water consumption and the need to dispose of waste off-site. We would anticipate that similar approaches will be adopted for the other major allocations identified in the emerging Strategy, thus reducing pressures on existing infrastructure and the need for significant investment to secure improvements to it.</p> <p>Improving junction capacity on the A47 will benefit traffic movements to the west of Norwich and are to be welcomed. Implementation of the</p>	



Norwich Area Transportation Strategy will also support our proposals by enhancing cross-city public transport connections.

The provision of affordable housing is a key concern and we are currently planning on the basis of up to 40% affordable housing at Colney Lane, with a particular consideration to the provision of key worker accommodation for hospital employees.

Policies for Places

Policy 1 Settlement hierarchy • we agree with the hierarchy as proposed, and welcome references to development at Colney/Cringleford.

Policy 2 Strategy for growth in the Norwich Policy Area - we agree with the overall strategy. While we do not disagree with the strategic locations for employment development, it is important to retain flexibility and there is a danger that this could be threatened by implied restriction on types of uses at the Airport and Hethel in particular. However we accept that there may be merit in concentrating research and education activity around UEA/NRP and will design the proposal at Colney accordingly.

Proposals for bus rapid transit and junction improvements on A47 are supported

Policy 4 The remainder of the Norwich urban area - in general we support this policy, particularly the provision of rapid bus links between the city centre and Cringleford/NRP and the encouragement given to the expansion of further education facilities. The protection of green infrastructure links to the rural fringe is also supported and we recognise that this is particularly important for developments planned for the edge of the city. However we consider that, in addition to identifying key areas for regeneration, the policy should identify key areas within the urban area which could be considered for development. In the west of the city, the limit of the urban area is effectively marked by the A47. It is our contention that the Colney Lane area should be identified as a potential development area - this would accord with Policy 1 and fit with the public transport strategy. By providing new employment and housing opportunities, it would also act as a stimulus to the social regeneration of western Norwich which is promoted by Policy 4.

Policy 5 Locations for major change and development in the Norwich Policy Area - we welcome the fact that all three options include reference to a strategic employment site at Colney. However it is not clear whether the swathe of "strategic growth location" running across the south of the city, as shown on the diagrams in Appendix 1, is intended to encompass locations such as Colney Lane. We consider that Colney Lane should also be identified as a potential area for residential development, in order to provide a balanced settlement at that location. All three options include proposals for varying degrees of development outside the boundary formed by the A47. Development of land at Colney Lane must be considered more sustainable than these locations because : it is much closer to existing trip destinations, including key employment and education sites and the facilities of the hospital; it is closer to the city centre; it already enjoys excellent public transport links; and it benefits from established infrastructure. The owners have a clear objective to



secure the delivery of the development in accordance with market demand and it follows that the site is capable of being delivered early in the plan period. The sustainability of the location and the deliverability of the proposal mean that it scores highly against the objectives of the Strategy and the principles set out in Policy 5.

Area-wide policies

Policy 13 Reducing environmental impact - we strongly support this policy and the concept of the sustainable neighbourhood. The supporting text describes sustainable neighbourhoods as communities which "will enjoy the facilities, the high quality movement opportunities, the job opportunities and the recreational and leisure opportunities that should be part of the quality of life for everyone". Planned development at Colney Lane would meet all of these criteria.

Policy 14 Housing delivery - we support this policy and welcome the approach to take account of economic viability in determining affordable housing provision. We agree that 40% is an appropriate starting point for determining affordable housing provision and will be adopting this as a target for provision in our proposals for Colney Lane.

Policy 15 The economy - we support this policy, in particular references to facilitating the expansion of, and access to, further and higher education provision; encouraging links between training/education provision and relevant business concentrations including co-location where appropriate; and support for enterprise hubs at NRP and other accessible locations in the area. Key employment sites must be accessible by public transport.

Policy 16 Strategic access and transportation - we support this policy, particularly its emphasis on planning development close to essential services, in a way which encourages walking and cycling as the primary means of travel; and improving public transport accessibility to and between Main Towns and Key Service Centres. Development at Colney Lane would deliver against these criteria.

Implementation and monitoring

Policy 19 Implementation and monitoring • we welcome indications that the CIL mechanism will include for the assessment of viability of new settlement proposals so that realistic demands for infrastructure payments are made by the authorities (Question 32). The emphasis on securing high quality design is also to be welcomed, though the phrase "accredited participatory design process" needs to be clarified.

Conclusions

While broadly supportive of the Strategy, we consider that it should highlight areas for development within the urban area of Norwich, as well as areas for regeneration. The broad approach of identifying the potential for 2000 homes in the south of the city lacks clarity and may understate the extent of development which can be achieved in this area. In this context we believe that development of about 2500 houses at Colney



	Lane, with development of an research/science park on adjacent land, presents an eminently sustainable solution which can deliver against Policy 1 of the Strategy.	
7615	<p>Yare Valley Society 4. Spatial portrait</p> <p>Page 13: Para.4.2 refers to the importance of the Wensum valley (which we fully endorse) but not to the Yare, or to the Tas, which we consider merit similar acknowledgement (without the reference to brownfield sites).</p> <p>Objective 8 Page 22: We also propose that Objective 8 should make explicit reference to the importance of the river valleys in the context of landscape and nature conservation.</p> <p>The second last paragraph could read "Biodiversity, locally distinctive landscapes especially the river valleys of the Yare, Wensum and Tas will be protected and enhanced."</p> <p>Policy 2 Page 27: We are concerned at the apparent open ended reference to the expansion of the UEA and NRP in Policy 2 and would wish to see a firm reservation that development which would be detrimental to the character of the Yare valley will not be permitted. Paragraph 3 ("Employment development") Second item could read "Significant expansion of health, higher education and science park activity at UEA and at NRP without detriment to the character of the valley of the river Yare."</p> <p>Policy 4 Page 30: We consider that Policy 4 should make explicit reference to the protection of the Yare, Wensum and Tas valleys in the section headed "Green infrastructure." Paragraph 3 ("The completion"). This would read better as "The completion of riverside walks and river Yare, Wensum and Tas valley walks extending out into the surrounding countryside."</p> <p>Policy 17 Page 54: We fully support the general approach of Policy 17, especially the first sentence. The second sentence, ("Development proposals should ..."), however, is not forceful enough and should read "Development proposals which would harm areas of environmental importance will not be permitted."</p>	
7644	<p>Bidwells Bidwells have recently been appointed by Crane and Son to promote the Former Piggeries site at Fengate Lane, Marsham, through the Local Development Framework (LDF) and Strategic Housing Land Availability Assessment (SHLAA) processes.</p> <p>Initially, I am formally registering the Former Piggeries site at Fengate</p>	



	<p>Lane, Marsham as being available for development. I therefore request that the land is considered and assessed for development through the Council's current Joint Strategic Housing Land Availability (SHLAA) process and eventually also through the forthcoming Site Specific Allocations Development Plan Document (DPD). A plan of the land is attached to this letter.</p> <p>I will review the Joint Core Strategy Options consultation documentation when it is published and consider a more detailed response in respect of delivery aspects in due course In the meantime, the following general comments are made:</p> <p>contend that the Core Strategy should recognise the importance that settlements outside of the Norwich Policy Area including Marsham will have in accommodating g and delivering growth The Vision and Spatial Strategy needs to acknowledge that key villages (service centres and other villages) such as Marsham will need to accommodate levels of growth appropriate to their size, role and function so that they continue to maintain their important role of service centres serving rural communities We suggest that any growth targets applied to such settlements are not expressed as ceilings to development but rather targets to be reached and breached in appropriate circumstances i e to achieve sustainability targets</p> <p>I intend to pursue the site's allocation, potentially as a mixed use development site (employment and housing) through the forthcoming Site Specific Allocation's document process.</p>	
7668	<p>Mr Mike Walden</p> <p>I have just read the Summer Update 2008 regarding housing proposals.</p> <p>I live in Wymondham am sick and tired of complaints against building more houses. I earn more than £50 000 a year and cannot hope to buy an acceptable house. This is wrong! There have been too many people having it too good for too long. They are sitting on hundreds of thousands of pounds of unearned house price capital which has maintained the economy and kept Labour in power long after they should have gone.</p> <p>Well now hopefully the bubble is bursting and the only way I can afford an acceptable house is if thousands end up in negative equity and lose their jobs. Roll on the recession that's what I say.</p> <p>IF THE PEOPLE WHO COMPLAIN THIS LOUDLY AGAINST HOUSE BUILDING WOULD HAVE SHOUTED JUST AS LOUD AGAINST IMMIGRATION THEN WE WOULD NOT BE IN THIS SITUATION NOW!! (and I have a letter from a government department stating immigration is one third of the housing problem - which means immigrants owe me around £50 000 plus interest between them over the next 20 years if I were to buy now - unless of course house prices crash - fingers crossed hey!)</p> <p>It is supply and demand. If you are going to allow old people to live and couples to separate and immigrants to move into the area then you have</p>	



	<p>to build more houses - and we are running out of space aren't we?</p> <p>And when you build these houses stop calling some of them affordable. THEY ARE NOT AFFORDABLE THEY ARE CHEAP AND CRAMPED AND DON'T HAVE ENOUGH PARKING SPACES - and will cause social problems in the future. People need space and privacy.</p> <p>An affordable house is one that can be purchased with 3 times salary - IE a teacher on £25 000 a year should be able to buy a 2 / 3 bed semi for £75 000. How far off that target are you???</p> <p>Just because the majority want to keep their unearned value in their properties does not mean it is right they should do so. They should campaign as strongly to reduce the local and national population or keep quiet.</p>	
7674	<p>Barton Willmore Policy 14 - Housing Delivery</p> <p>2.12 The Technical Consultation Document presents three distribution options for housing growth. The starting point for this distribution is the East of England Plan growth target for the three districts of Broadland, Norwich and South Norfolk. Policy H1 of the East of England Plan requires a target provision of 37,500 additional dwellings in the three districts during the period 2001 to 2021.</p> <p>2.13 Completions since the commencement of the plan period comprise 7,450 dwellings (as at end March 2006). Therefore a further 30,050 dwellings are to be provided in the period up to end March 2021. Whilst, it is noted that a large proportion of the remaining requirement is identified as commitments (comprising sites with planning permission or allocated sites), actual completions is the key factor. In particular, the annual completion rate is of particular importance in achieving the required growth. Annual completion rates since commencement of the East of England Plan period for Broadland (340 units per annum), Norwich (700 units per annum) and South Norfolk (460 units per annum) are below the target rates necessary to provided 37,500 additional dwellings by end March 2021. The combined completion rate of 1,500 units per annum is significantly lower than the future rate 2,000 dwellings per annum that is required to achieve at least 37,500 dwelling completions.</p> <p>2.14 Supply factors have been very favourable in recent years due to market conditions and strong housing demand that have favoured homebuilding. Constraints imposed by the planning system and other factors have prevented higher growth rates from being achieved. The long lead-in periods required for the development of major schemes is a factor to consider in the identification of future sites for growth. A balance of small, medium and larger development sites is required to optimise growth potential, rather than dependence on a housing distribution that focuses on larger sites for development. Emerging tougher market conditions will inevitably impose financial constraints on the larger sites that require major infrastructure provision, whereas this infrastructure cost burden is likely to have less effect on smaller sites that can integrate</p>	



more easily using the available spare capacity of local infrastructure, rather than being reliant upon new infrastructure provision.

2.15 Projection of growth rates beyond 2021 to 2026 implies an additional requirement for 10,000 dwellings, using the residual growth rate of 2,000 dwellings per annum. Completions of 7,450 dwellings in the 5-year period 1 April 2001 to end March 2006 will therefore require identification of sites for provision of 40,000 dwellings. The Joint Core Strategy housing distribution proposes three options for 24,000 of these dwellings, on the assumption that existing planning permissions and commitments of 14,656 dwellings will be taken up. Annual monitoring will be required to assess whether these permissions and site allocations come forward or not, and if so, further allocations will be required to ensure that annual completion rates are achieved. Notably, of the planning permissions and commitments comprising 14,656 dwellings, some 12,250 of these dwellings are within Norwich and South Norfolk. Only 2,406 committed dwellings comprise sites in Broadland District, which also has the smallest share of completions in the 2001-2006 period of the three districts.

2.16 It is evident that in order to meet their annual completion rates, Broadland District will be required to maximise opportunities for allocation of available sites. The Council should first look to brownfield, redundant sites close to the urban area such as Little Plumstead Hospital to help meet the RSS targets.

Proposed Options for Major Development

2.17 Paragraph 1.11 of the Executive Summary summarises three potential options for the location of major development. The Secretary of State for Health would broadly support Option 3, which allocates 3,000 new homes for Broadland District, as this option provides the highest level of growth on smaller sites in Broadland District, such as Land at Little Plumstead Hospital. This will provide the best prospect for the development of smaller sites in Broadland in the interim period, during the long lead-in that will be required before completions can be achieved on any of the larger sites in the three districts. It is anticipated that a planning timescale of at least 5 years, and up to 10 years, will be required to achieve completions on these larger sites, due to the complexity of these developments and the time span of the LDF process.

Affordable Housing

2.18 The Technical Consultation Document sets out a requirement for 40% affordable housing on sites of 5 dwellings or more. We comment on the affordable housing Policy set out at Policy 14 and supporting text at paragraph 8.6 as follows. We would reiterate our response to the Issues and Options Document, that the threshold for provision of affordable housing on new development sites should not be set lower than 15 units. Setting the threshold lower than 15 units would be likely to make smaller sites, especially brownfield sites with other constraints, unviable to develop.

This could put undue pressure on the release of green field locations for new development.



2.19 The Core Strategy issues and Options Document suggested a graduated level of affordable housing to be provided on new development sites and our client was in agreement to this. We are disappointed that this has not been carried forward to the Technical Consultation stage. A graduated approach would assist in bringing smaller sites forward, particularly given the current market conditions. We would suggest that graduated levels of affordable housing be retained at the following thresholds:

20% Affordable Housing Provision (15-50 units)

30% Affordable Housing Provision (51 + units)

2.20 The East of England plan seeks only 35% affordable housing provision. The Joint Core Strategy Issues and Options Document seeks to comply with the Policies of the East of England Plan. It is therefore recommended that the emerging LDF Policies seek up to 35% affordable housing provision on new development sites of over a threshold of 15 units, in line with East of England Plan Policy. It is important that up to is inserted into the Policy to allow flexibility on brownfield sites where there may be a large number of constraints and where the 35% target cannot be met within a viable scheme.

Flexibility

2.21 Our client is currently marketing the site for both institutional C2 use and residential use. The Core Strategy should allow flexibility in emerging Policy for either C2 or residential uses to come forward. This approach would also allow for the site to be developed for a mixture of C2 and residential use should this be the most viable option.

2.22 Should the Council insist that the site continue to be allocated for C2 use then there should also be flexibility with regards to the amount of new footprint that would be acceptable for C2 use on the site.

3.1 Broadland District, Norwich City and South Norfolk Councils are currently preparing a SHLAA that will assist in planning for housing development. The joint SHLAA will form part of the evidence base for the GNDP's Joint Core Strategy and will determine the suitability of sites for housing development. At this initial stage, the Greater Norwich Development Partnership (GNDP) has put together a database of sites that could be included within the SHLAA.

3.2 The database of sites put together by GNDP includes the land at Little Plumstead Hospital East but does not include Little Plumstead Hospital West. Little Plumstead Hospital East is nearing completion and therefore does not require consideration for new future housing development. However, Little Plumstead Hospital West should be included within the SHLAA as suitable for future housing development. To summarise, the site is redundant, brownfield and benefits from an approved development brief for residential development. Development of the site would also assist in providing a new primary school at Little Plumstead Hospital West and additional infrastructure benefits.

3.3 The case for allocation of the Little Plumstead Hospital Site for residential development is set out below.



3.4 Little Plumstead Hospital is highly accessible to Norwich city and the employment uses at Broadland Business Park. The development of Little Plumstead Hospital for residential development would retain the identity of Little Plumstead village and would not cause harm to the countryside that surrounds the site. This is demonstrated through the Little Plumstead Hospital Development Brief, which was approved by Broadland District Council in April 2007.

3.5 The Little Plumstead Hospital site is close to the A47 Yarmouth Road, which provides a fast link to Great Yarmouth to the east and to Norwich to the west. There are three railway stations within 5km of the site; Salhouse railway station, Brundall Gardens and Brundall railway stations provide fast links to Norwich (under 10 minute journey time), Great Yarmouth (22 minutes), and Lowestoft (35 minutes). Norwich Airport is situated under 10km to the north west of the site.

3.6 The site is accessible to a range of community facilities and services. St Gervase's and St. Protase's Church lies immediately to the north east of the site and within a 2 km radius of Little Plumstead Hospital in the adjacent settlements of Little and Great Plumstead, are other facilities including a post office and shop, a community hall, and places of worship. The site is also located close to the recently developed Broadland Business Park which as well as providing employment uses, also contains a large fitness and leisure centre.

3.7 Furthermore, a bus service is to be provided as part of the development of the hospital site. The developer will also contribute towards off-site improvements for pedestrians and cyclists, as well as off-site highways works. A site for a new enlarged primary school will also be provided, as will community facilities and an element of affordable housing.

3.8 Our client believes that all brownfield sites should be brought forward in preference to Greenfield sites, even if the greenfield site might be better located to facilities and services. If the Little Plumstead Hospital site were not to be brought forward for development and a greenfield location developed for housing instead, then there would still be an issue of what would happen to the Little Plumstead Hospital site in the future. The site would likely become derelict and open to vandalism, which would have a detrimental impact on the setting and environment of the village.

It would not be a sensible approach to take un-developed green land away from the countryside for development in favour of brownfield sites such as Little Plumstead Hospital.

4.1 Our client generally supports the proposals set out in the Joint Core Strategy Technical Consultation Document and favours Option 3, which directs 3,000 new dwellings to Broadland District.

4.2 New development should be directed to brownfield locations first before greenfield sites are released for development, even if these brownfield locations are not as sustainable. It is important that sites such as Little Plumstead Hospital are not left derelict and open to vandalism



	<p>while greenfield sites are taken for development.</p> <p>4.3 The Little Plumstead Hospital site is largely redundant and therefore housing policies should reflect the phased release of the site for housing development. The current Local Plan Proposals Map designates the whole of Little Plumstead Hospital under policy GS5 (Institutions in Large Grounds) which should be deleted and replaced in the LDF documents by the housing allocation notation.</p> <p>4.4 Furthermore, the Council should amend affordable housing requirements in line with the recommendations made by the East of England Plan, and a graduated approach to the provision of affordable housing is supported. This will allow more brownfield sites to come forward and the development of them viable.</p> <p>4.5 The current allocation of the Little Plumstead Hospital site only allows for redevelopment within the footprint of the existing buildings. However, this is unlikely to generate PPS3 minimum densities for development on the site (minimum 30 dwellings per hectare). Therefore we believe that this requirement should be deleted to allow for the site to come forward at an acceptable density and in line with national planning policy guidance in the form of PPS3.</p> <p>4.6 The Little Plumstead Hospital site could be developed at a higher density than the existing footprint would allow for the following reasons:</p> <ul style="list-style-type: none">• The site is previously-developed land and therefore the best use of the land should be made in favour of allocating greenfield sites for development;• The site is more accessible to employment, the city, facilities and services than other villages within Broadland's relatively rural district; and• The development of the site will bring forward a range of benefits including an enlarged new primary school site, community uses, improved infrastructure, affordable housing and public open space. <p>4.7 I hope that the enclosed representation can be taken into account in the future stages of the production of the Joint Core Strategy for the LDF. I trust that our client's interest in the LDF process will ensure that we continue to receive details of all further developments and publications released as part of the LDF process.</p>	
7675	<p>The Fairfield Partnership</p> <p>This report has been prepared by SLR's transport and highways professionals on behalf of 'The Fairfield Partnership' who have commissioned SLR to provide a feasibility stage transport and highways overview of a possible residential development of a parcel of land at Chapel Lane, Wymondham, Norwich.</p> <p>The report has been written specifically with the objective of providing further information to supplement the promotion of the site for inclusion within the Joint Core Strategy, as part of the Great Norwich Development Partnership's 'call for evidence'.</p> <p>1.2 Executive Summary</p>	



The study has considered the policy context of the proposals to develop the proposal site for approximately 150 residential dwellings and, following this, the report concludes that the proposals would broadly meet with the objectives of both local and national sustainable transport policies.

The study has also considered the site's geographical location in the context of jobs, shops and services. The results of the assessment indicate that the proposal site is ideally sited to access these facilities by non-car sustainable travel modes. Indeed, the site benefits from connectivity to a well formed network of pedestrian footpaths that connects to these facilities which are, in the main, all within easy walk distance of the site.

For those services not within the desirable walking distance, which includes the nearest food supermarket and the main employment area in the town, cycling and bus travel offer a reasonable alternative. With this in mind, the proposal site is likely to satisfy relevant accessibility criteria.

In respect of vehicular access, the study has determined that the site frontage onto Chapel Lane is extensive and would allow scope to provide an access in a range of locations and by a range of junction types. As such, it is considered that, at this stage, the development site could be delivered from a highways perspective.

Finally, the suitability of the site has been considered against alternative development sites located to the south and east of the town. The comparison focused on accessibility to jobs, shops and services, both in the context of geographical locations but also having regard to the topography of the travel routes and any other local features. The results support the proposal site as being slightly superior in this context.

3.0 BASELINE CONDITIONS

3.1 Introduction

This section of the report considers the various baseline conditions pertinent to the proposal site from a transport and accessibility perspective.

3.2 Site Location

The site comprises an area of land that adjoins the north-western extents of the existing built-up area of Wymondham, Norwich. The site is best described as being triangular in shape and situated approximately 3.4 kilometres west of the A11 trunk road via the B1135 and about 2.2 kilometres north of the B1172. The location of the proposal site is shown on Drawing FS/1.

The site is bound to the north by Chapel Lane and a small number of residential properties: the site frontage onto Chapel Lane is some 800 metres. To the east, the site abuts an area of open pasture whereas to the south, the site is bound by a narrow belt of woodland and a local spur of the Norwich railway line.



3.3 Existing Highway Network

The local highway network pertinent to the proposal site is defined by Chapel Lane, which runs roughly on a north:south alignment and connects with the village of Kimberly to the north and Wymondham town centre, via Cock Street.

3.4 Non-Car Accessibility Credentials

3.4.1 Access by foot

The proposal site can be made to be accessible by foot with appropriate consideration to the needs of pedestrians within the masterplan and inclusion of footpaths and crossing points along the site frontage to Chapel Lane.

As existing, Chapel Lane offers illuminated pedestrian routes located on raised footpaths that connect to form a network of pedestrian routes that link to key services and transport hubs within the town. Typically the pedestrian routes lie adjacent to roads that are subject to 30 mph speed limits, which is suggestive of a certain level of safety.

The local topography is also favourable to trips being undertaken by foot in so much that walk routes to destinations within the town centre, for example, are relatively flat and would not preclude walk trips from being undertaken.

PPG13 states that "walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under 2 kilometres" (PPG13, paragraph 75). Within this distance, the site would be accessible to key services such as healthcare, education, leisure, shopping, post offices and a railway station. A full appraisal of the site's accessibility to the key services is given later in this section.

In consideration of the above, the proposal site is located where it can connect to a well developed pedestrian network that would encourage the propensity for trips to local services to be made by foot.

3.4.2 Access by Bicycle

Whilst there is no dedicated cycle infrastructure near to the site, the local roads can accommodate cycling on the basis that traffic flows and vehicle speeds are low, and the road geometry allows cars to pass cyclists without detriment to safety. This is supported by site observations which showed cyclists using the road network adjacent to the proposal site.

In addition, the topography of the local area in particular is favourable to cycling, which might encourage some trips to some local destinations to be undertaken by bike, particularly school trips and those destinations that might be beyond a desirable walking distance, such as the local superstore or employment area to the east of the town. Indeed, PPG13 identifies that "cycling also has potential to substitute for short car trips,



particularly those under 5km, and to form part of a longer journey by public transport" (PPG13, paragraph 78).

In respect of the likely effects of the proposals, the scale of development is unlikely to materially alter the level of traffic flow on the roads or the speeds of vehicles using the roads and, as such, cycling trips from and to the site could be accommodated.

3.4.3 Access by Bus

The bus stops that are nearest to the proposal site are located at the junction of Chapel Lane / Longlands Drive, adjacent to the proposal site. The bus stops are not provided with any signage, timetable information or bus shelters, which means that the bus stops are almost completely inconspicuous to potential travellers. This is likely to restrict the patronage of any services operating from these stops.

The bus stop serving southbound buses is provided with a small bus lay-by located just south of the junction with Longlands Drive. Passengers boarding/alighting northbound buses do so from a landing platform made up of a row of concrete slabs located opposite the junction with Longlands Drive.

The existing bus stop provision is likely to be considered inadequate and improvements are likely to be required as part of any residential development of the proposal site. However, it is envisaged that any improvements would be limited to the provision of better signage, timetable information, raised kerbs, and a bus shelter together with improved landing platform for northbound buses.

The feasibility of providing a bus shelter for southbound bus passengers appears to be limited by the width of the footway and adjacent property boundaries. And, whilst a bus layby for northbound buses would be beneficial, the scale of development and anticipated northbound traffic flow means that this is likely to be excessive. Nevertheless, considering the apparent extent of public highway, it is envisaged that any improvements could be accommodated within the public highway.

In respect of existing bus services, a basic review of current timetable information has been undertaken based on information obtained from the Traveline website. The results indicate that only one service operates from the bus stops adjacent to the proposal site, this being the number 9 service.

The number 9 bus service stops adjacent to the proposal site on a bi-hourly basis throughout the day, travelling between Wymondham and Norwich. The first service is at 08:52 and the last service is at 16:52hrs, which means that the bus service does not represent a viable means of travel for commuters.

Since there is no existing commuter bus service that is within an acceptable walk distance of the application site, it is recommended that dialogue be undertaken with the bus operator to establish whether they would be likely to alter their services to reflect the addition of a further 150 residential dwellings being in the area.



3.4.4 Access to Rail

The nearest railway station is Wymondham Railway Station which is located towards the southern extents of the town, less than 2-kilometres from the proposal site. The railway station is served from Cemetery Lane and the main station building and platform is sited on the northern side of the railway line, maximising the accessibility of the proposal site to rail services.

Those rail services operating from the station include those travelling to Cambridge and Norwich, from which point access to the national rail network may be gained. The railway station is managed by National Express East Anglia and it is provided with 5 disabled car parking spaces and 6 partially sheltered and secure cycle parking spaces which covered by CCTV systems. In addition, the nearest bus stop is located on Silfield Road, located just north of the railway station.

3.4.5 Access to Community Facilities

Both PPG13 and PPS3 advocate the siting of residential developments within easy access to jobs, shops, leisure and key public services. With this in mind, an appraisal of the site has been undertaken to consider the geographical location of the proposal site in the context of access to key services within the town. Drawing FS/2 has been prepared to supplement the appraisal and it shows the location of the proposal site and the following key services:-

- Post offices;
- Schools;
- Hospitals;
- GP surgeries;
- Pharmacies;
- Leisure centres;

6.0 SUMMARY & CONCLUSION

6.1 Summary

- The report has demonstrated that the proposal site is accessible to jobs, shops, education, leisure and other local key services by various modes including walking, cycling, rail and car.
- Accessibility to bus services is currently limited, although the development of the site may encourage the operator to divert or increase the frequency of existing bus services.
- This feasibility study has demonstrates that the proposal site could be developed using one of several access options and, consequently, the proposal site represents a viable development from a transport perspective.
- Following an appraisal of the site's accessibility credentials to key services, it is concluded that the proposal site accords more favourably against local and national Government sustainable transport policies than an alternative development area to the south and east of the town. As such, the proposal site should be considered preferable over the alternative development area.



	<p>6.2 Conclusion</p> <p>The results of this report indicate that the proposal site is likely to meet many of the key policy criteria relevant to achieving planning permission for a residential development of the site, from a transport perspective. Furthermore, the appraisal has demonstrated that the proposal site sits above alternative sites located to the south and east of the town in the hierarchy of accessible sites.</p> <p>Employment areas;</p> <ul style="list-style-type: none">• Railway stations;• The town centre; and• Food superstores. <p>The appraisal demonstrates that the proposal site lies within the PPG13 maximum walk distance (2 kilometres) to all of the services within the town, with the exclusion of the Waitrose superstore and employment area which are both slightly beyond 2 kilometres. Nevertheless, both are accessible by bike.</p> <p>3.4.6 Summary of Non-Car Accessibility</p> <p>The proposal site would be accessible by a choice of means of transport including walk, cycle, rail and car. The site is not fully accessible by bus, although the addition of 150 dwellings may result in services being diverted past the site. The site is, however, ideally located in respect of access to the majority of key services in the town, which would increase the propensity for local residents to walk or cycle.</p> <p>Therefore, on balance, the proposal site is generally favourable in terms of the objectives of both local and national Government sustainable transport policies.</p>	
7688	<p>Andrew Martin Associates (Goymour Estates) On behalf of our clients, Goymour Properties Ltd, we submit representations to the above consultation document, Goymour Properties Ltd are promoters of the Royal Norwich Golf Club (RNGC) site in Hellesdon (see attached plan ref: 080//1/01) which can contribute towards achieving the spatial yin on for the area by providing development in a sustainable location within the Plan period</p> <p>Whilst we recognise that our site does not constitute a 'major growth location and therefore does not need to be specifically identified in the Joint Core Strategy, it is capable of bringing forward a significant quantum of housing within the strategic growth location to the north of the City Centre within the Broadland NPA.</p> <p>Introduction</p> <p>We welcome the opportunity to submit representations to the Joint Core Strategy. We understand that the purpose of the technical consultation is two-fold:</p> <ol style="list-style-type: none">1. To seek guidance on whether the current approach is supported; and	



2. to seek guidance on whether different options for accommodating major growth in Norwich can be achieved in practical terms. In brief, our view on the above is as follows.

1. We generally support the strategy adopted by the Greater Norwich Development Partnership. We are promoting land at the Royal Norwich Golf Club for development and this site falls within the Broadland NRA where at least 2000 dwellings are proposed on small and medium sites in sustainable locations under Policy 2

2 Given our position, as an agent acting on behalf at a developer, we are not able to comment on the delivery in technical terms on the strategy as a whole. However we can provide information in relation to the deliverability of our client's a site.

In view of our position, it is difficult to match our representations with the questions raised in the Regulation 25 Response Form. To assist the Council, We have attempted to confine our comments within the Response form (although it should be noted that our responses are generally of a more specific nature). However, we also consider that it is beneficial to provide the Council with additional information in relation to this site, given its potential to make a significant contribution towards housing supply.

Policy 5 identifies three options for the locations for major change and development in the NPA. Given the absence of detailed information at this stage regarding the locations for development, it is difficult to select a preferred option, As slated above, we propose and at the Royal Norwich Golf Club for development, which falls under the category of Broadland smaller sites. Options 1 and 2 identified 2,000 units and Option 3 identifies 3000 units for the Broadlands NRA. It is understood that at this stage no detailed site identification and selection process has taken place. We consider that Option 3 would be the roost appropriate in this regard given that the RNGC can contribute a significant number of dwellings (between 700 arid 1,200) and we would not wish to see the development of this site constrained

The Royal Norwich Golf Club

Detailed representations were Submitted by Savills on behalf of the Members of the RNGC to Broadland District Council in August 2006. We do not consider that it is necessary to provide such detail at this stage to the Joint Core Strategy. However in recognition of the potential of this site to make a significant contribution, we summarise the latest position and key characteristics of the site below:

Position Update:

- Goymour Properties Limited has acquired an interest in the RNGC and is seeking residential development on this site. AMA is acting as agents for Goymour Properties Ltd
- Members of the RNGC have voted in favour of selling the site to Goymour Properties ltd and relocating to Weston Park Colt Club. they endorse the proposals as the site no longer fully meets requirements. Restrictions on course expansion due to the site being now surrounded by built development, together with the split nature of the site, have lead



	<p>to Members seeking an alternative site for the golf course.</p> <ul style="list-style-type: none">• the golf club will be relocated to the Weston Park Golf Club (which is just 11 km from the representation site). This will enable Weston Park to be upgraded from an 18 hole course to a 36 hole championship facility. Membership of both courses has lessened over recent years and the proposals will amalgamate both memberships• In order to progress the development of this site, a meeting has been held with officers at Broadland District Council to flag the site up as a development opportunity. <p>The requirement for further technical studies has been identified and initial work has commenced. By the time of the next consultation further updated information will be available</p> <p>Key Characteristics:</p> <ul style="list-style-type: none">• the site is deliverable within the Plan period. The landowners and the developers are committed to bringing proposals forwardThe site is capable of accommodating around 100 to 1200 dwellings, contributing towards the housing requirements for the area• Development will provide affordable housing in accordance with the Council's requirements. It could also contribute towards improvements to local leisure and community facilities either by financial contribution towards existing facilities or on site provision:• The proposals would include on site open space which would be accessible for new and existing residents (unlike the golf course, which is restricted to members)• Highly sustainable location within the existing urban built form of Norwich, adjoining existing employment and residential development:• The site lies in close proximity to a wide range of facilities and services (see attached plan ref: 080/4/02)• The site benefits from existing bus routes connecting the site with the City Centre and the railway station. The proposals would contribute towards public transport improvements, as necessary• Although Drayton Road suffers congestion at peak times, various junction improvements undertaken by the Council coupled with the proposed Norwich Northern Distributor Road will improve the traffic in the vicinity of the siteAssessments will be undertaken with regard to the impact of the proposed development and appropriate mitigation measures will be implemented, <ul style="list-style-type: none">• Although this is a greenfield site, it is important to recognise that there is insufficient brownfield land to accommodate housing and therefore sustainable green field sites, such as this will come forward in the Plan period:• Land lies within Flood Zone 1 and therefore the site is not at risk from flooding:• The surface water front impermeable areas will be designed as a Sustainable Urban Drainage System (SUDS):• The site is previously undeveloped and would not require decontamination: and• Development would not affect any listed buildings or Scheduled Ancient Monuments <p>As identified above, We are not in a position to answer specific questions about the Whole strategy. However, we can respond directly in relation to the RNGC site (see attached response form)</p>	



7777	<p>Entec UK The response represent our formal response to the questions posed. This submission has attempted to adopt a robust approach to identifying Wymondham as a location that can accommodate a sustainable urban extension. We have made the case that Wymondham should be allocated a greater amount of housing than is put forward in the current proposed growth options. This is particularly the case as lower order settlements, such as Hethersett Long Melton and Long Stratton, clearly cannot accommodate the housing levels proposed. The site would therefore be able to support the delivery of the RSS dwelling numbers.</p> <p>The subject site located to the south west of Wymondham, can be found to be inherently sustainable as is borne out by the High Level Sustainability Appraisal provided in Appendix A to this document. National policy, notably PPS1, PPS3, and PPS12, support the development of the site for housing and/or mixed housing and employment. Careful design, incorporating foot and cycle way networks, plus the proximity of the site to Wymondham railway station will provide a practical and sustainable choice of transport for commuters and will assist in meeting the aims of PPG13.</p> <p>This submission is considered thorough and includes (under separate cover) a development concept plan submitted early on in the LDF process in order to demonstrate how a mixed use proposal at south west Wymondham could come forward.</p> <p>Hopkins Homes submit that Wymondham can deliver strategic growth for the following reasons:</p> <ul style="list-style-type: none">• Settlement: Wymondham is the largest market town in the policy area, which is well connected to all forms of transport, has a range of infrastructure, employment and facilities.• Housing Delivery: The Norwich policy area only has sufficient allocated land for 57% of the requirement over the plan period (i.e. land for at least 14,200 homes is required). Completions during the year ending 31st March 2007 were 13% below the minimum target set out in the RSS. Certainty is required within the Housing Land Supply, there is uncertainty about whether the number of outstanding commitments and allocations will be brought forward in the prevailing market. Greenfield allocations in sustainable location such as Hopkins Homes site at Land South of Wymondham need to be allocated to ensure a robust, a deliverable housing supply and provide certainty to the Housing Trajectory.• Appropriate sites: Where there is a lack of supply of PDL Greenfield development should be released at locations adjoining Norwich and Wymondham that have good sustainability credentials.• Sustainable: The appraisal (In Appendix A) demonstrates that in sustainability terms the site and development will give rise to many beneficial effects. The development would help to create a safe, attractive and vibrant extension to the settlement of Wymondham.• Landscape and Biodiversity: The separate Landscape and Visual assessment demonstrates that the identified landscape and visual effects can be reduced and mitigated through the design development. <p>The development concept has included such methods and also facilitates</p>
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	<p>the development of the green corridor between Attleborough and Wymondham. Results from the walkover survey and desktop study indicate that the site supports a range of habitats typical of the wider area that are unlikely to be of notable conservation value. The hedgerows and ditches on-site are likely to be of limited value to conservation and act as relatively poor corridors for wildlife movement across the site.</p> <ul style="list-style-type: none"> • Transport: The site benefits from excellent links to the Core Network of Trunk Roads via the A11, is served by direct bus connections to Norwich. The site is within walking or cycling distance of the centre of Wymondham and Wymondham Station. The main issue identified was the need to create new vehicular access points to site. There are however good opportunities to create acceptable access points from the highway frontages along the B1172 and Sutton Lane. As a result and in light of the revised PPS12, the Joint Core Strategy should look to allocate the Hopkins Homes site at South Wymondham, as the site is of strategic importance. 	
<p>7778</p>	<p>EWS This is the response of English Welsh & Scottish Railway (EWS) to the technical consultation dated August 2008.</p> <p>EWS is the largest rail freight haulier in Great Britain employing just under 5000 staff and hauling 90 million tonnes of freight a year by rail. Rail freight has grown nearly 70% in the last twelve years and is widely regarded as a sustainable means of freight transportation as it produces one fifth of the Carbon Dioxide per tonne moved compared with road transport.</p> <p>The expansion of rail freight is a Government priority with an expectation of a 50% increase in the amount of freight using rail by 2014 and a doubling in the longer-term.</p> <p>Within East Anglia there is considerable rail freight traffic from the port of Felixstowe, which is expected to increase significantly in the next ten years. This has created a plan for the upgrade of the route between Felixstowe and Peterborough via Ipswich, Bury St. Edmunds and Ely.</p> <p>However, we believe that there are other freight opportunities in East Anglia. Current traffic including gas condensate from North Walsham, aggregates to Trowse, timber from Brandon and potatoes from Scotland via Ely. In the past freight traffic has been generated from Ryburgh and Dereham and the development of the Mid-Norfolk Railway means that reinstatement of freight on this route remains a possibility.</p> <p>Whilst traditional thinking may now regard Norfolk as a county that relies solely on road haulage we believe that local and regional planning policies should recognise the potential for rail freight and ensure that existing and future rail freight sites are protected together with old rail routes that have the potential for reopening. We suggest, therefore, that the Joint Core Strategy should recognise the potential for rail freight expansion and ensure that other policies are consistent with that policy.</p>	



<p>7779</p>	<p>Forestry Commission As you are probably aware, the Forestry Commission is the Government Department with statutory responsibility for trees and woodland and we welcome the opportunity to comment on this "call for evidence".</p> <p>The responsibilities and powers of the Forestry Commissioners in relation to planning are derived mainly from the Forestry Act 1967 and the Environmental Impact Assessment Regulations 1999 (see Annex 1). Our interests lie in the protection of trees and woodland, and on the use of trees and woodlands to enhance, and mitigate against the effects of, development. We can provide guidance on Government policy on these issues.</p> <p>Government policy highlights the importance of trees and woodland, particularly Veteran Trees and Ancient Woodland and there is a clear presumption against development that results in their loss, unless there are overriding public benefits arising from the development (see Annex 2). Should development lead to the removal of any trees or woodland, or in any way detrimentally affects such trees or woodland, the Forestry Commission would expect significant mitigation measures to be employed.</p> <p>The opportunities for trees and woodlands to mitigate development in Greater Norwich should reflect Policy ENV5 Woodlands of the East of England Plan, which in turn reflects the Regional Woodland Strategy . The issues of most importance to trees and woodland that should be reflected in development plans are as follows:</p> <ul style="list-style-type: none"> • Renewable Energy -the proposed renewable energy policies should include wood for heat (see Annex 3) • Flood amelioration - woodland can contribute to sustainable flood control • Green infrastructure - trees and woodland have a number of specific roles within green infrastructure • Brownfield land - woodland has a unique role in on-site containment for some contaminants <p>The Forestry Commission has considerable expertise in the delivery of sustainable planning solutions through the use of trees and woodland. We have intelligence on brownfield remediation, land regeneration, community engagement and renewable energy solutions. The Forestry Commission are the largest managers of green space in the region, with a track record of delivering large scale peri-urban accessible areas. Greater Norwich is partly defined by, and important for, its trees and woodlands. As such, we would hope and expect that your officers treat these issues seriously. I would be more than happy to discuss any aspects of these issues with you or your staff.</p>	
<p>7810</p>	<p>Mrs Parson I trust that this merger will not affect our good relationship with Broadland District Council cooperation past and present, and make a less efficient approach with such a large conglomeration in may facets</p>	



7811	<p>Mr N J Fox Having read the Joint Core Strategy Summer 2008 update I find that nowhere is there any mention of the likely cost of the proposals. Until this is made available it is a waste of time even considering them. Whatever changes are made the cost is going to run into tens of £millions.</p> <p>Has any serious consideration been given to the infra-structure needed to service the schemes being put forward? In yesterday's press it was hinted that we may soon be facing frequent power cuts because of inadequate power sources. And what about water supplies? Where are they coming from? Anglian Water are already hard-pressed to supply some areas.</p> <p>Why change something which is working well? I am perfectly satisfied with the service I get from Broadland District Council. Any contact I have had with your staff has always been dealt with efficiently and helpfully. Biggest has seldom proved to be best and I am very much against the proposed restructuring of local authorities. As far as I am concerned, leave well alone!!</p>	
7836	<p>Roger Heap I am just in receipt of the Summer Update 2008 of your joint strategy for Broadland, Norwich and South Norfolk. I see in it that 47,500 home have to be built by 2026. 47,500 houses being built constitutes a large town of some 125,000 inhabitants and if these are spread over the three Council areas will upset a large number of your rate payers (voters).</p> <p>Why not then, put all your eggs in one basket and build a new large town somewhere on the green fields of Norfolk? You will naturally upset some people if you do this, but far fewer than spreading them over the three Councils.</p> <p>A new town will have the advantages of new rail and road connections to major rail networks and motorways, new schools, community centres, and a new, sewage system, together with industrial centres. I have pointed this out to you before but obviously has gone unnoticed.</p>	



Appendix

Representation from

East of England Regional Assembly

National Grid



Chairman: John Reynolds

Chief Executive: Brian Stewart

Greater Norwich Development Partnership
c/o Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich
NR7 0DU

Please ask for: Helen De La Rue
Direct Dial: 01284 729407
Fax: 01284 729429
Email: helen.deelarue@eera.gov.uk
Date: 12 September 2008

Dear Sir / Madam,

**Re: Greater Norwich Development Partnership Joint Core Strategy for
Broadland, Norwich and South Norfolk - Technical Consultation**

Thank you for consulting the Assembly with regards to this matter.

The Regional Planning Panel Standing Committee considered the attached report at the meeting on 12 September 2008. The appendix to the report constitutes the Assembly's formal response to this consultation.

If you have any queries concerning this response, or any other issue relating to conformity with the Regional Spatial Strategy, please contact myself or James Cutting, Team Leader - Strategy & Implementation (01284 729434 or james.cutting@eera.gov.uk).

Yours faithfully

**HELEN DE LA RUE
ASSISTANT PLANNING OFFICER
STRATEGY & IMPLEMENTATION**

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The East of England Regional Assembly exists to promote the social, economic and environmental well being of the region through a partnership of elected representatives and other regional stakeholders. It is designated as the voluntary regional chamber under section 8 (1) of the Regional Development Agencies Act 1998.



AGENDA ITEM: 3

**Regional Planning Panel Standing Committee
12 September 2008**

**Greater Norwich Development Partnership Joint Core Strategy for Broadland,
Norwich and South Norfolk - Technical Consultation**

Report by Regional Secretariat

Purpose

To give a response to the Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical Consultation.

Recommendation

The Standing Committee is asked to consider that the comments in Appendix A constitute the Assembly's response to this consultation.

1. Introduction

- 1.1 The Greater Norwich Development Partnership has invited comments on the Joint Core Strategy for Broadland, Norwich and South Norfolk Technical Consultation.
- 1.2 The consultation is open from 4 August to 26 September 2008. The consultation document can be found at:
<http://www.eastspace.net/cndp/DisplayArticle.asp?ID=8292>
- 1.3 A map of the area under consideration is included as Appendix B to this report.

2. Background

- 2.1 The Joint Core Strategy (JCS) is being co-ordinated by the Greater Norwich Development Partnership (GNDP), an association of Norwich City Council, Broadland District Council, South Norfolk District Council, Norfolk County Council and the Broads Authority, was formed in order to manage development and growth in the Greater Norwich Area.
- 2.2 The Greater Norwich Area (GNA) encompasses the Norwich Policy Area (NPA) and the districts of Broadland and South Norfolk, and covers a tract of 1495 km² (577 miles²). The GNA had a population of approximately 350,000 in 2001¹, a third of whom lived within the Norwich urban area. The towns of Aylsham, Diss, Harleston and Wymondham, and the Key Service Centres of Blofield, Brundall, Hingham, Loddon, Long Stratton, Reepham and Wroxham are important centres for population and employment. The remainder of the GNA is a rural area characterised by small market towns, villages and hamlets.

¹ <http://www.statistics.gov.uk/census2001/profiles/33.asp>



- 2.3 Norwich has been designated as a Key Centre for Development and Change and, as such, is a regional focus for housing, employment, retail, media, leisure, tourism, cultural, and educational development. The area was also designated as a Growth Point by the Government and will receive funds to support the anticipated growth. Norwich has a wide economic base and exerts a powerful commercial, social and cultural influence over the surrounding area.
- 2.4 The GNA is easily accessible by road and rail. There are a number of cycle routes in the area, including access to Sustrans National Route 1. Norwich International Airport provides internal UK links and services the European holiday charter business. Norwich City has waterway links to the Broads and the North Sea via the Rivers Wensum and Yare.
- 2.5 The ecology and landscape of the GNA are diverse, and include farmland (grades 2 and 3), grassland, heathland, marshland and reed beds. There are a number of important ecological sites, specifically Environmentally Sensitive Areas along the banks of the Rivers Tas and Yare, and a Special Area of Conservation adjacent to the River Wensum.
- 2.6 Policy H1 of the Regional Spatial Strategy sets a minimum target of 37,500 new homes to be built in the GNA between April 2001 and March 2021. Policy E1 assumes that at least 35,000 new jobs will be created by 2021.

3. Regional and Local Context

- 3.1 At a regional level, planning guidance for the Greater Norwich Area is contained within the adopted East of England Plan (May 2008), hereafter referred to as the Regional Spatial Strategy (RSS). The RSS replaces guidance previously contained within Regional Planning Guidance for the East (RPG6) and most of the policies in the Norfolk Structure Plan.
- 3.2 The Joint Core Strategy will replace the Broadland District local Plan (Replacement), which was adopted in 2006, the City of Norwich Replacement Local Plan, adopted in 2004, and the South Norfolk Local Plan, adopted in 2003.
- 3.2 In considering general conformity issues, EERA is required to review all Local Development Framework documents against the most recent version of the Plan. This assessment has therefore been carried out against all policies contained within the adopted RSS using the template in Appendix A.

4 Comments

- 4.1 The Issues and Options stage of the Joint Core Strategy was published for consultation in November 2007. A report was considered by the RPP Standing Committee on 1 February 2008. At that time, the consultation document did not raise any general conformity issues, though the GNDP were advised that further work was required in relation to locations for growth, and that consideration



should be given to sustainable development, deliverability, and to impact on funding possibilities for the necessary infrastructure.

4.2 The Technical Consultation Document contains strong illustrations of spatial vision and detailed descriptions of policies with clear and concise presentation. The DPD is supported by:

- Greater Norwich Employment Growth and Employment Sites and Premises Study;
- Greater Norwich Water Cycle Study – stages 1 and 2a;
- Greater Norwich Retail and Town Centres Study;
- Green Infrastructure Study;
- Norwich Area Transport Strategy;
- Norwich Growth Area – Infrastructure Need and Funding Study;
- Sustainability Appraisal Scoping Report; and
- Strategic Flood Risk Assessment.

Further planned studies include:

- Renewable Energy Study;
- Community Infrastructure Study;
- Strategic Housing Land Availability Assessment;
- Knowledge Economy Study; and
- Feasibility Study for a Concert / Convention Hall.

4.3 The GNDD anticipates provision of 47,500 new homes by 2026, and has identified three potential options for major development, each of which would provide 24,000 dwellings.

Location	Option 1	Option 2	Option 3
Norwich	4,000 new homes	4,000 new homes	4,000 new homes
Broadland	2,000 new homes	2,000 new homes	3,000 new homes
South Norfolk	2,000 new homes	2,000 new homes	2,000 new homes
Sproston and Rackheath area	6,000 new homes	6,000 new homes	5,000 new homes
Hethersett and Little Melton area	4,000 new homes	4,000 new homes	No significant development
Mangreen, Swardston, Mulbarton, and Swainsthorpe area	No significant development	No significant development	4,500 new homes
Wymondham	4,000 new homes	2,000 new homes	2,000 new homes
Costessey and Foston area	2,000 new homes	2,000 new homes	1,000 new homes
Long Stratton	No development	2,000 new homes	1,500 new homes

Implementation of any of these options is dependent on significant improvements to highway networks. Construction of the Norwich Northern Distributor Route and dualling of the A47 to the east of Norwich have been approved for delivery between 2011 and 2013. Whilst implementation of Option 1 would be consistent with regional policy, Options 2 and 3 would not be consistent as they rely on construction of a Long Stratton bypass on the A140. This scheme has been assessed as Priority 2 under the Regional Funding Allocation and has not been



approved for delivery, as it is currently considered to be of more local than regional importance, compared to other projects in the Region.

- 4.4 The Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical consultation document is in general conformity with East of England Plan with the exception of policy on the Code for Sustainable Homes Assessment, waste management, renewable energy, and prioritisation of use of brownfield land.

Policy 13 should be strengthened to include:

- Aims above minimum levels in the Code for Sustainable Homes;
- Guidance on waste management and construction waste; and
- Targets for use of energy from renewable sources

5. Recommendations

- 5.1 The Standing Committee is asked to consider the comments in Appendix A as a basis for a response to the Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical Consultation.

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APPENDIX A - LOCAL DEVELOPMENT DOCUMENT CHECKLIST

PART ONE – DOCUMENT INFORMATION

LOCAL PLANNING AUTHORITY	Greater Norwich Development Partnership
DOCUMENT TITLE	Joint Core Strategy for Broadland, Norwich and South Norfolk
DOCUMENT TYPE	DPD
DOCUMENT STAGE	Technical Consultation (Regulation 25)
CONSULTATION START DATE	4 August 2008
CONSULTATION END DATE	26 September 2008

PART TWO – GENERAL POINTS

QUESTION	ANSWER	COMMENTS
Does the area covered lie within the Eastern Region?	Yes	
Are all references to the East of England Plan correct?	Yes	The Consultation Document accurately cites the adopted RSS, but most of the supporting documents were published before May 2008 and refer to the previous version of the Plan.
Does the area covered include a key centre for development and change?	Yes	Norwich is identified as a Key Centre for Development and Change under policies SS3 and NR1.
Are there any key issues covered by the document that are of strategic or regional importance?		Norwich is a preferred location for strategic growth and a priority area for regeneration (SS5). The city has strategic importance as an employment site (E3), for business clusters in the media and life-science sectors (E4), as a retail centre (E5), for tourism (E6), as a historic city (ENV6), as an inter-regional transport node (T5), and as a transport investment priority (T15). The Norwich Northern Distributer Road has been identified as a strategic infrastructure scheme. Expansion of Norwich Airport and the associated economic development of the area are noted under policy E7.



PART THREE – CONSISTENCY / CONFORMITY CHECKLIST

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is there a clear drive for sustainable development?	SS1	Spatial Vision Spatial planning objectives Policy 1 – 9 Policy 12 - 18	Consistent. The document contains a clear illustration of the spatial vision for the GNA and detailed descriptions of policies to support sustainable development.
Is there a policy seeking to maximise the use of brownfield land and setting a minimum target of 50%?	SS2	Policy 2 Para 4.2 Appendix 1 – 3	There is no target for reuse of brownfield land. The consultation document states that "Numerous brownfield sites have been developed in recent years and some further opportunities remain. In the short term, a significant proportion of development will be focused on brownfield sites, but in the longer term there will be fewer available." ² Significant brownfield regeneration is taking place along the banks of the river in Norwich and further schemes are planned. In relation to proposed options for housing development the consultation document states that "further contingency and flexibility will be provided by efforts to encourage further brownfield opportunities and bring forward larger sites more quickly". Re-use of previously developed land should be prioritised to the fullest extent, as required by RSS policy SS2. Windfall brownfield sites should be developed to their maximum potential (where doing so remains consistent with other RSS policies) in order to protect the environment and landscapes.
Is there a clear pattern of development for key centres / and other urban and rural areas?	SS3 SS4	Policy 1 Policy 6 - 8 Policy 12	Consistent. Settlement hierarchy is clearly defined. The majority of new development will be focused on the Norwich urban area, followed by Main towns, key service centres, service villages and other villages.

² GNDP, JCS for Broadland, Norwich and South Norfolk (August 2008) Policy 2, para 7.2



QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the role of city and town centres clear? Is there a clear retail hierarchy?	SS6	Policy 3 Policy 5 - 7 Policy 12	Consistent. In Norwich City Centre the main focus will be on retail, leisure, business and cultural development. Significant growth and regeneration is proposed for the main towns of Aylsham, Diss, Harleston and Wymondham to stimulate their social and economic sustainability. Modest growth is anticipated in the ten Key Service Centres, and established retail and service areas are to be protected.
Is there a policy to address regeneration?	SS5	Spatial vision Objective 12 Policy 4	Consistent. Regeneration is being carried out in the Norwich inner urban area and along the banks of the river. Priority areas for regeneration have been identified throughout the City. The GNDP anticipates that the social and cultural economy will stimulate regeneration in Norwich, in market and other towns, and in the key service centres and other villages.
Is there a policy dealing with land in the urban fringe, if appropriate?	SS8	Policy 1 Para 7.5	Consistent. Policy SS8 requires that "LDDs should ensure that new development in or near the urban fringe contributes to enhancing its character and appearance and its recreational and/or biodiversity value and avoids harm to sites of European and international importance for wildlife in particular." The NPA covers the urban area of the City and the first ring of surrounding villages, as well as the market towns of Wymondham and Long Stratton. In order to meet RSS targets, major development is required throughout the area. The primary focus for housing development is the urban area of Norwich and the urban fringe parishes. In the three potential options for major development, locations for strategic growth are proposed as infill bands through and between existing sub-urban developments together with significant urban extensions to the north-east and south-west of the City.



QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the East of England Plan employment target met?	E1	Objective 5	Consistent RSS employment targets are acknowledged. Objective 5 states that "Existing employment sites will be safeguarded and enough land for employment will be allocated in line with the RSS".
Is employment land protected?	E2	Para 1.3	The Norfolk County Council/EEDA/EERA Norfolk Employment Growth Study ³ , which included a section on the Norwich sub-region, was published in April 2005. Further information was obtained from the 'Greater Norwich Employment Growth and Employment Sites and Premises Study' ⁴ , which was carried out between October 2007 and February 2008 to identify and update the opportunities and measures required to encourage job growth.
Is the East of England Plan housing target met? Is there a 15 year plan for housing delivery?	H1	Spatial vision Policy 2 - 6 Policy 15 Policy 5	The GNDP anticipates investment at strategic and other employment locations will support and enhance the economy by sustainable means. The strategy for growth in the NPA includes substantial employment development at major growth locations, especially in the City Centre. Outside the City, local jobs are to be retained and improved. Provision is made for 47,500 new homes in the GNA by 2026. Of these, 7,500 homes have already been built and planning permission has been granted for a further 14,700. There are 3 potential options for major development (see table in section 4.2 of this report). Each would provide a total of 24,000 homes. However, options 2 and 3 are not consistent with regional policy: they propose provision of new housing at Long Stratton, which would be dependent on the construction of a Long Stratton bypass on the A140. This scheme has been assessed as Priority 2 under the Regional Funding Allocation and has not been approved for delivery, as it is considered to be of local rather than regional importance. Alternative sources of funding would be required if it is to be progressed.

³

QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is there an affordable housing policy and does it meet the East of England Plan target?	H2	Objective 4 Policy 14	Consistent. A target of 40% affordable housing is proposed on all qualifying developments. Provision of affordable housing will be required on sites of 5 or more dwellings in accordance with the needs assessment for the area. Exception sites may be considered for affordable housing where local need is demonstrated.
Is there policy to address the needs of Gypsies and Travellers?	H3	Policy 14	Consistent. Fifty eight permanent Gypsy and Traveller pitches will be provided by 2011, as recommended in the RSS Single Issue Review.
Is there a policy seeking to try and change travel behaviour?	T2	Spatial vision Objective 3 Objective 11 Policy 13 Policy 16	Consistent. There are objectives to encourage healthy and active lifestyles and to reduce the need to travel, especially by private car. Policy 16 encourages walking and cycling, proposes improvements to public transport within the City and main towns and between towns and Key Service Centres, and supports provision of IT links to facilitate of home working.
Is there a policy seeking to enhance provision for non-motorised forms of transport?	T9		The Norwich Area Transport Strategy (2006) ⁵ addresses accessibility, congestion, and the requirements for growth in and around the City. The strategy promotes traffic management measures for sustainable development, encourages travel choice, and fosters growth in the number of trips by means other than the private car, including public transport, in support of the cultural, economic, and social communities.
Are any major transport generators covered by appropriate policies?	E7, T12	Spatial vision Objective 5 Policy 2	Consistent. The Airport is highlighted for employment growth. A new business park associated with the airport is proposed, together with rapid transit bus routes and a railway station.

<http://www.norfolk.gov.uk/consumption/groups/public/documents/article/ncg049932.pdf>





QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the local road network addressed?	T8	Policy 16	Generally consistent. Policy 16 addresses strategic access and transportation issues. The GNDP intends to promote improvements to public transport, including local and intercity rail services, and major road networks.
Do any transport schemes promoted match regional priorities?	T15		Construction of the Norwich Northern Distributor Route and dualing of the A47 to the east of Norwich have been approved for delivery between 2011 and 2013. Both of these are required for the GNDP options for major development. Work on improvements to the A47 Postwick (A17 / A1012) interchange and expansion of the existing park & ride site is due to begin in the near future. As noted above, construction of a Long Stratton bypass on the A140 has been assessed as Priority 2 under the Regional Funding Allocation and has not been approved for delivery. Aspects of improvements to the Area's transport systems are investigated in the Norwich Growth Area – Infrastructure Need and Funding Study (December 2007) ⁶ .
Is there a policy dealing with green infrastructure?	ENV1	Policy 3 Policy 4 Policy 17	Consistent. The need for improvements to the public realm, open space and green linkages is recognised in Policy 3. Green infrastructure and links between currently fragmented habitats and to the rural fringe will be protected, maintained and enhanced. The environmental assets of the GNA will be protected, maintained and enhanced. The Greater Norwich Green Infrastructure Strategy (November 2007) ⁷ aims to promote sustainable development and support economic growth by providing accessible green infrastructure, promoting ecological networks and links, and improving access to habitats and green spaces, thus improving quality of life and helping to address climate change.

⁶ http://www.eastspace.net/gndp/documents/Executive_Summary.pdf & http://www.eastspace.net/gndp/documents/Final_Report_-_Appendix.pdf
⁷ http://www.eastspace.net/gndp/documents/GNDP_GI_Strategy_Exec_Summary.pdf & [http://www.eastspace.net/gndp/documents/GNDP_GI_Strategy_Final\(1\).pdf](http://www.eastspace.net/gndp/documents/GNDP_GI_Strategy_Final(1).pdf)



QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Are landscape, wildlife & geological conservation covered by a policy?	ENV2 and ENV3	Policy 10 Policy 11 Policy 13	Consistent. Although some greenfield land will be required for new developments, targeting brownfield land and integrating green infrastructure will protect biodiversity and the environment. Policy ENV2 affords the highest level of protection to the East of England's nationally designated landscapes including the Norfolk and Suffolk Broads. Within the Broads priority should be given to conserving and enhancing the natural beauty, wildlife and cultural heritage of the area, promoting public enjoyment and the interests of navigation. Policy 11 addresses this well. The Norfolk Biodiversity Action Plan presents studies of habitat and species and is supported by Biodiversity Supplementary Planning Guidance for Norfolk ⁸ .
Is agricultural land and soils conservation covered by a policy?	ENV4	Policy 13	Much of the rural area of Greater Norwich is grade 2 and 3 agricultural land. This area contains many attractive built and natural features including areas of notable landscape character, geological and biodiversity interest. Agriculture is an important aspect of the local rural economy. Although the need to protect the landscape is recognised, significant developments are proposed for rural locations.
Are woodlands protected by a policy?	ENV5	Policy 13 Policy 19	Generally consistent. The spatial vision states that Norwich will maintain its woodland and heathland. Secure arrangements for maintenance of green infrastructure, including woodlands, are proposed. Several woodland improvement projects are proposed and assessed in the Green Infrastructure Strategy
Are conservation and enhancement of the historic environment addressed?	ENV6	Spatial vision Objectives Policy 3 + 13 Policy 17	Consistent. The GNA's rich historic heritage is recognised. The character and environment of the City of Norwich, the historical centres of the main towns, and characteristic features of villages and the countryside are all to be protected and enhanced.

⁸ <http://www.norfolkbiodiversity.org/SAPsHAPs/Cutlines.pdf>



QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Is the achievement of a high quality built environment included addressed?	ENV7	Policy 13 Policy 19	There are requirements for high quality design and development, and efficient use of land and resources. However, the DPP should include policy requiring new development to aim above minimum levels in the Code for Sustainable Homes Assessments.
Is there is a policy dealing with the reduction of CO ₂ emissions?	ENG1	Spatial vision Policy 13	Generally consistent. There is an objective to minimise the contributions to climate change and address its impact, and Policy 13 states that "all development will be energy efficient and minimise carbon dioxide emissions".
Is there a policy dealing with renewable energy including the setting of a target?	ENG2	Spatial vision Objective 9 Policy 13	The Norwich Growth Area Infrastructure Need and Funding Study (November 2007) ⁹ recognises the requirement for new supply stations and grid systems. Significant expenditure and work are proposed between 2011 and 2017. Although energy efficiency measures and use of energy from renewable sources are to be promoted, there is no target for renewable energy. A Renewable Energy Study is planned (Appendix 6). The JCS Sustainability Appraisal ¹⁰ states that there are currently no renewable energy sites in the GNA. ENG2 includes the aim that by 2010 10% of the region's energy and by 2020 17% of the region's energy should to come from renewable sources. This has been noted in the Sustainability Appraisal, but should also be reflected in Policy 13 of the JCS.
Is there policy ensuring water efficiency?	WAT1	Objective 9	Consistent. Efficient water management, including sustainable drainage systems, is a priority.

⁹ http://www.eastspace.net/ondp/documents/Final_Report_-_Appendix.pdf (Appendix F)

¹⁰ http://www.eastspace.net/gndp/documents/SA_SCOPING_REPORT_-_FINAL_VERSION_-_ADOPTED_DEC_2007.pdf



QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Are there policies dealing with integrated water management and with sustainable drainage technologies? Is there a policy dealing with flood risk management?	WAT4	7.12 7.14 Policy 13 Spatial portrait	The Infrastructure Need and Funding Study includes indicative costs and timing for water management required for proposed development schemes. It has been noted that new water supplies will be needed in Diss and Harleston to provide for proposed levels of growth. Development will be adapted to climate change and located to minimise flood risk. According to Environment Agency flood maps, most of the GNA is at minimal risk of flooding (less than 1 in 1000 year event), with the possible exception of land beside rivers and the Broads. Appropriate consideration has been given to flood risk in planning of locations for proposed development. A Strategic Flood Risk Assessment and a Greater Norwich Water Cycle Study - Stage 1 (November 2007) ¹¹ have been prepared.
Is there a policy dealing with culture and leisure?	C1 and C2	Policy 18	Consistent. Continued attention to culture and leisure, including protection of existing assets and enhancement of the area's cultural heritage is intended. A Feasibility Study for a Concert / Convention Hall is planned (Appendix 6). The JCS should be used to form an overall framework for the delivery of cultural infrastructure with a clear expression on how developments will contribute to the delivery of buildings and programmes. This is particularly important for Norwich as a priority area for regeneration.
Are there policies dealing with waste management?	WM1 – WM8	Objective 9 Policy 13	Objective 9 states that 'domestic and commercial waste will be minimised by encouraging waste reduction, reuse, recycling, composting and safe energy recovery' ¹² . Although waste is generally covered by County policy, it is important that appropriate references to waste management are included in policy for major expansion. Policy measures should also be introduced that support better

¹¹ <http://www.easingsloe.net/gndp/documents/introduction.pdf>

¹² GNDP JCS for Broadland, Norwich and South Norfolk (August 2008) Objective 9 (p22)



QUESTION	RSS POLICY	LOCAL POLICY	COMMENTS
Are there policies dealing with minerals?	M1	Policy 13	management of construction waste alongside statutory Site Waste Management. Generally consistent. Policy 13 requires that all development should protect mineral and other natural resources.
Are policies developed in accordance with policy for key centres for development and change?	NR1	All	Consistent. The status of Norwich as a KCDC is fully considered.
Are there any policies dealing with implementation and monitoring?	IMP1 and IMP2	Policy 19	Generally consistent. Policy 19 proposes that all development should be accompanied by appropriate infrastructure and secure maintenance arrangements will be established, and there is a commitment that quality of new development will be monitored through the careful scrutiny of Design and Access statements for all appropriate requirements. However, it is noted that this policy "is drafted on the assumption that the government introduces a Community Infrastructure Levy along the lines indicated in earlier published consultation papers. It will need amendment should the proposals be abandoned or substantially changed, and if necessary following the review of local government structures in Norfolk". ¹³

¹³ CNPP JCS for Broadland, Norwich and South Norfolk (August 2008) Policy 13 (p.58)

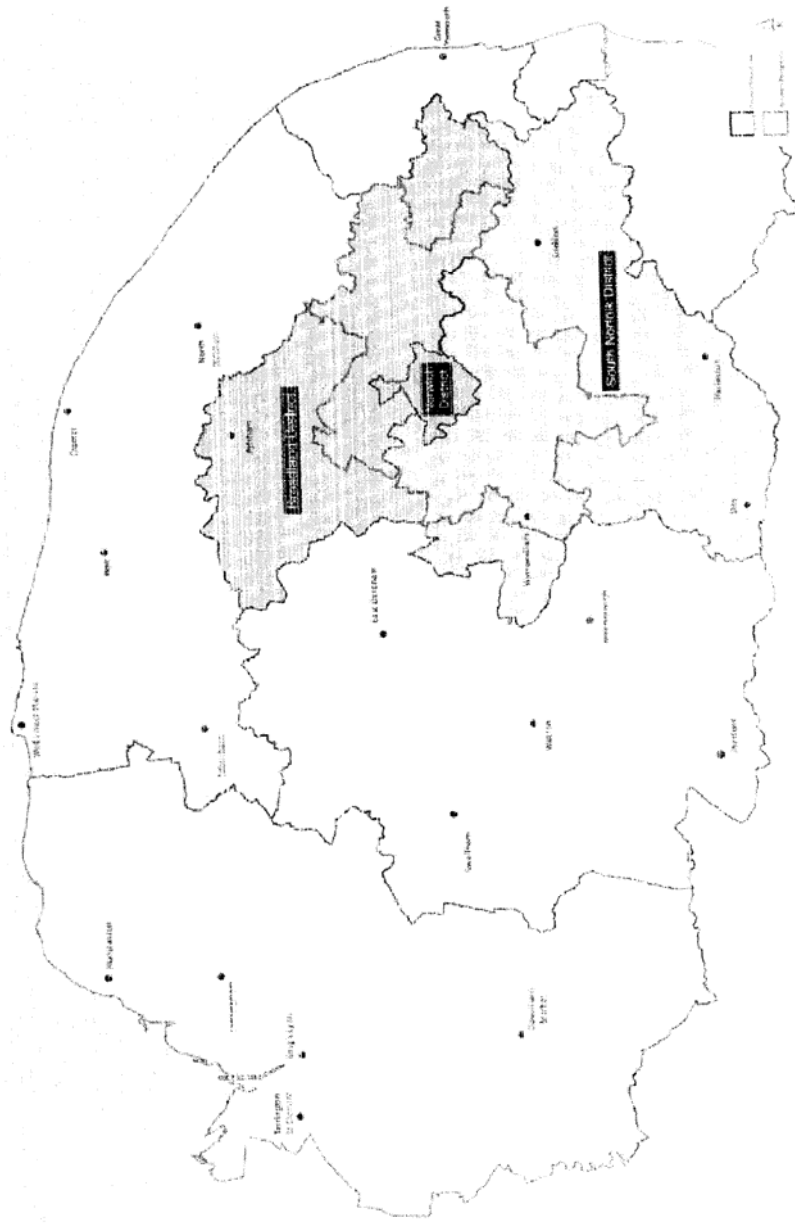


PART FOUR – OVERALL ASSESSMENT

QUESTION	ANSWER	COMMENTS
Is the DPD in general conformity with the RSS?	Yes	<p>The Greater Norwich Development Partnership Joint Core Strategy for Broadland, Norwich and South Norfolk Technical consultation document is in generally conformity with East of England Plan with the exception of the areas detailed in Part 3 of the report.</p> <p>Re-use of previously developed land should be prioritised to the fullest extent, as required by RSS policy SS2.</p> <p>Policy 13 should be strengthened to include:</p> <ul style="list-style-type: none">• Aims above minimum levels in the Code for Sustainable Homes Assessments;• Guidance on waste management and construction waste; and• Targets for use of energy from renewable sources. <p>in relation to the potential options for major development, implementation of Option 1 would be consistent with the RSS.</p>



APPENDIX B
Norwich Policy Area and Joint Core Strategy Area
(GNDP Joint Core Strategy for Broadland, Norwich and South Norfolk - Issues and Options consultation document – November 2007)







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22 September 2008

Dear Ms Eastaugh

Greater Norwich Development Partnership Joint Core Strategy – Technical Consultation

Thank you for your letter dated 1st August 2008 regarding the above document. Having reviewed the document we would like to make the following general and specific comments and also take this opportunity to emphasise the role of National Grid and to highlight areas and issues where we feel consultation with National Grid would be appropriate in future Development Plan Documents (DPDs).

Overview – National Grid

National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.

Electricity Transmission

National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.

National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses. Please see the enclosed leaflet for more information on who to contact regarding electricity distribution issues in your area.



To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing patterns of generation and supply.

Gas Transmission

National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.

New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.

Gas Distribution

National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.

National Grid and Local Development Plan Documents

The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for;

- An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated installations).
- New forms of infrastructure (e.g. smaller scale distributed generation, gas storage sites).

Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.



We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues;

- Any policies relating to overhead transmission lines, underground cables or gas pipeline installations
- Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines
- Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations
- Any policies relating to the diverting or undergrounding of overhead transmission lines
- Other policies relating to infrastructure or utility provision
- Policies relating to development in the countryside
- Landscape policies
- Waste and mineral plans

In addition, we also want to be consulted by developers and local authorities on planning applications, which may affect our assets and are happy to provide pre-application advice. Our aim in this is to ensure that the safe and secure transportation of electricity and gas is not compromised.

National Grid infrastructure within Greater Norwich Development Partnership's administrative area

Electricity Transmission

National Grid's high voltage electricity overhead transmission lines / underground cables within Greater Norwich Development Partnership's administrative area that form an essential part of the electricity transmission network in England and Wales include the following:

- 4YM line, 400,000-volt routes from Bramford substation in Mid Suffolk to Norwich main substation in South Norfolk District.
- 4VV line, 400,000-volt route from Norwich Main substation in South Norfolk to Walpole substation in Kings Lynn and West Norfolk District.

The following substations are also located within the administrative area of Greater Norwich Development Partnership:

- Norwich Main Substation 400kV

National Grid has provided information in relation to electricity transmission assets via the following internet link:

<http://www.nationalgrid.com/uk/landanddevelopment/ddc/electricitytransmission/overheadlines>

A CD giving detailed electricity overhead and underground asset information is also available. Should you wish to receive our CD and be included on our mailing list please contact us at the address below.



Gas Transmission

National Grid has the following gas transmission assets located within the administrative area of Greater Norwich Development Partnership:

Pipeline	Feeder Detail
1705	5 Feeder Bacton / Yelverton
1706	5 Feeder Yelverton / Diss Comp Tee
1709	3 Feeder Bacton / Roudham Heath
1720	4 Feeder Bacton / Great Ryburgh
2648	2 Feeder Bacton / Kings Lynn Comp
2739	27 Feeder Bacton / Kings Lynn

National Grid has provided information in relation to gas transmission pipelines via the following internet link:

<http://www.nationalgrid.com/uk/LandandDevelopment/DDC/gastransmission/gaspipes/>

A CD giving detailed pipeline asset information is also available. Should you wish to receive our CD and be included on our mailing list please contact us at the address below.

Gas Distribution

National Grid Gas Distribution owns and operates the local gas distribution network in the Greater Norwich Development Partnership area. If you require site specific advice relating to our local gas distribution network then information should be sought from:

Plant Protection Team
National Grid Gas
Lakeside House
The Lakes
Bedford Road
Northampton
NN4 7SN

Specific Comments

Electricity Transmission

The Core Strategy Technical Consultation document identifies three 'Growth Options' for the Greater Norwich Development Partnership area. Growth Option 3 proposes a new 'country town' in the vicinity of National Grid's Norwich Main 400kV substation.

While National Grid does not object to future redevelopment in this area, we would like to take this opportunity to highlight that substations are vital to the efficient operation of our electricity transmission network for switching circuits or transforming voltage. Norwich Main substation is an essential part of the transmission network and has an important role to play in maintaining the supply of electricity to the local distribution network operator and therefore ultimately to homes and businesses throughout Norwich and the wider area. The site is therefore "Operational Land" and, for the reasons outlined above, there may need to be further essential utility development at the site in the future.



Furthermore, National Grid is able to provide information and advice on noise from high voltage plant to both planning authorities and developers. It is possible for the developer to mitigate significantly the effects of noise from an existing overhead line or sub-station by attention to site layout and design of new developments, for example by including landscaping or by placing the noise-sensitive elements away from the high voltage plant.

National Grid's high voltage overhead electricity transmission lines which are routed via Norwich Main substation are located in the vicinity of Hethersett, which has been identified for accommodating growth within Option 1 and Option 2 of the Core Strategy.

National Grid does not own the land over which the overhead lines cross, and it obtains the rights from individual landowners to place our equipment on their land. Potential developers of the sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ, because of the strategic nature of our national network. Therefore we advise developers and planning authorities to take into account the location and nature of existing electricity transmission equipment when planning developments.

National Grid prefers that buildings are not built directly beneath its overhead lines. This is for two reasons, the amenity of potential occupiers of properties in the vicinity of lines and because National Grid needs quick and easy access to carry out maintenance of its equipment to ensure that it can be returned to service and be available as part of the national transmission system. Such access can be difficult to obtain without inconveniencing and disturbing occupiers and residents, particularly where properties are in close proximity to overhead lines.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. To comply with statutory safety clearances the live electricity conductors of National Grid's overhead power lines are designed to be a minimum height above ground. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

National Grid seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which look at how to create high quality development near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

'A Sense of Place' is available from National Grid and can be viewed at:

www.nationalgrid.com/uk/senseofplace

Further information regarding development near overhead lines and substations is available here:

www.nationalgrid.com/uk/LandandDevelopment/DDC/devnearohl/



Gas Transmission

The Growth Options identified in the Core Strategy Technical Consultation document include a strategic growth location at the north east of the Norwich Policy Area which is situated in the vicinity of one of National Grid's high pressure gas transmission pipelines.

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties
http://www.nationalgrid.com/NR/ronlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf
- Gas Transmission Underground Pipelines – Guidance
http://www.nationalgrid.com/NR/ronlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance_2_.pdf

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition the following publications are available, these can be obtained from our web site or by contacting the team below.

- National Grid Electricity Transmission plc, Electricity Act 1989 – Schedule 9 Statement, preservation of amenity
- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations – Requirements for Third Parties
- A sense of place – Design guidelines for development near high voltage overhead lines

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database;

National Grid
Land & Development Stakeholder and Policy Manager
Land & Development Team
National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6TG

Tel: 0800 7312961

www.nationalgrid.com/uk/landanddevelopment

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours sincerely,

[via email]

Les Morris, Land and Development Team, Town and Country Planner