

**Greater Norwich  
Development Partnership  
Joint Core Strategy Examination**

**Written Statement on behalf of  
Landstock Estates Ltd and Landowners Group**

**Matter 3:**

**Strategy and Locations for major growth in the  
NPA (policies 9 and 10, and Appendix 5), including  
consideration of related access & transportation  
issues (policy 6) and other infrastructure issues**

## **PART A    OVERALL DISTRIBUTION OF GROWTH**

**A1    Are the absolute and comparative quantities of growth distributed to the main locations the most appropriate and are they founded on a robust and credible evidence base?**

1.1    The policies that fall to be considered under this issue are:

- Policy 4:        Housing Delivery.
- Policy 9:        Strategy for Growth in the NPA.
- Policy 10:      Locations for major new or expanded communities in the NPA.
- Policy 11:      Norwich City Centre.
- Policy 12:      The remainder of the Norwich Urban Area including fringe parishes
- Policy 13:      Main Towns.
- Policy 14:      Key Service Centres.
- Policy 15:      Service Villages.
- Policy 19:      The hierarchy of Centres.

### **Overview:**

1.2    We have set out in our response to Matter 02 our support for the focus of development, in principle, being Norwich and the Main Towns. In our response to Matters 10, we set out our position in respect of the Key Service Centres. In essence, our concerns arise due to the quantum of housing identified for the various settlements and the justification and delivery of the allocation.

1.3    In considering this Matter, we would suggest that three questions arise:

- Whether each settlement can and should accommodate the level of growth proposed, having regard to the evidence base?
- Whether some settlements are identified to accommodate a disproportionate level of growth having regard to the comparative merits of the settlements? and
- What changes do we seek?

### **The Role of Wymondham:**

- 1.4 As set out in Matter 01 and 02, we consider that Wymondham could and should be identified to accommodate a higher level of growth based on its 'Main Town' status in the NPA, and the capacity of the town as evidenced by the SEA/SA. We set out in our statement in response to Matter 01 various policy scenarios in which this could be achieved (including Policy changes) arising from :
- A failure or delay in the delivery of housing elsewhere in the NPA (either in South Norfolk or the Growth Triangle); and/or
  - A redistribution of growth to various settlement (see policy 9 and 14 for example); and/or
  - the allocation through subsequent DPDs/AAPs of the 'floating' 1,800 dwelling allocation.
- 1.5 The level of growth proposed by ourselves at Wymondham has been tested and supported by various iterations of the SEA/SA (JCS 3 Pages 37-38 Pre-Submission SA Report September 2009).
- 1.6 This level of growth would also have wider benefits such as delivering the BRT along the A11, as well as other infrastructure requirements required as a result of the growth. Notwithstanding that the SA Reg. 25 Report April 2009 identified Option 1 (i.e. 4,000 dwellings at Wymondham) as having significant advantages (and therefore the most suitable Option), it also identified that development as currently proposed at areas such as Long Stratton (i.e. to deliver the bypass) would be at the cost of other factors (such as the delivery of affordable units). The SA concludes on Long Stratton that *'Overall Long Stratton is a location that scores averagely'*. (see pages 229 – 236 JCS 3)
- 1.7 The Sustainability Appraisal (September 2009) (ENV9/JCS3) paragraph 2.2.59 identifies the importance of requiring a significant quantum of growth on the A11 to deliver the BRT and states *'However, the proposal for a total of 4,400 additional houses on the A11 corridor (Wymondham, Hethersett and Cringleford) is at the borderline of providing a potential market sufficient in size to support the development of a Bus Rapid Transit service. Increasing the total housing allocation to 5,000 would provide greater comfort regarding the market potential for BRT on this corridor.'* Clearly, the SA itself is suggesting that in order to achieve this objective, further housing is required to be distributed along the A11 corridor would be beneficial.

- 1.8 We do not consider that Wymondham's proposed housing provision reflects its sustainable credentials. This is especially so when Wymondham is identified as the only Main Town in the NPA (see settlement hierarchy Map). Logic therefore dictates that Wymondham is the main settlement for sustainable growth. We fail to understand how areas such as Long Stratton (itself identified as a remote location), earns a provision of 1,800 units, i.e. only 400 dwellings less than Wymondham. Furthermore, the distribution of 1,800 units at Long Stratton (identified as a Key Service Centre), also does not provide a balanced distribution of housing when compared to other Key Service Centres in closer proximity to Norwich i.e. 1,000 dwellings at Hethersett and only 100 – 200 dwellings at Poringland.
- 1.9 Notwithstanding the apparent disproportionate allocation of housing between settlements, we consider the various scenarios and the proposed changes to the Policies as set out in Matter 01, could allow for the mechanism for Wymondham to increase its role as a Main Town and be apportioned a greater distribution of housing within the JCS either through a direct increase in Wymondham's allocation or through a reserve site policy.

**A2 Is this pattern of development deliverable in infrastructure and market terms?**

- 1.10 We have set out in Matter 01 (paragraph 1.9) the risks associated with the North East Norwich Growth Area and the failure to deliver either Postwick Hub, the NDR or both. This is further explored in Matter 04 which sets out the fundamental infrastructure requirements for development of this scale. We have demonstrated above, that Long Stratton is not demonstrated by the evidence base to be a suitable settlement for such a level of growth as proposed in the JCS (especially when compared to the alternatives i.e. Wymondham) and is artificially high based on the need/aspiration for a bypass. Long Stratton is not the most suitable location for 1,800 dwellings and the need to fund the bypass from residential development is not a sustainable manner in which to deliver the spatial objective of the JCS and NPA, which will make either viability a concern or will be at the cost of other community benefits.
- 1.11 Wymondham is not constrained by such critical infrastructure provision as NE Norwich or Long Stratton. It is recognised that any growth in Wymondham will require upgrading to existing infrastructure. However, the early delivery of dwellings is not reliant on the delivery of this infrastructure and any costs associated with extending the infrastructure provision to accommodate 4,000 dwellings is considered reasonable and proportionate to the scale of growth. There are 'no showstoppers' in relation to the development of land to the NE of Wymondham. It is therefore considered that Wymondham is a deliverable location for up to 4,000 dwellings.

**A3 What flexibility exists within the overall strategy to accelerate/defer development in particular locations if circumstances make this necessary? Is the JCS sufficiently clear on this point and how such flexibility would be achieved?**

1.12 There is currently no evident flexibility written into the JCS to accelerate or defer development. It is apparent that the infrastructure required to deliver a significant proportion of housing in the NPA will not receive funding from Government (to be confirmed in the Autumn Spending review). If this is the case, Statement of Focussed Changes (SoFC) document (EIP 51) identifies that that without the NDR, 3,200 units could be delivered with the Postwick Hub improvements. The JCS does not provide a mechanism for the provision of housing in the NPA in the event that the NDR is not delivered and capacity is reduced in the plan period. This very likely scenario that could result in a total of only 3,200 units being delivered (of the original 7,000 units and assuming no Plan B as set out later in this matter) and up 3,800 units not being delivered and required to be provided elsewhere in the NPA. The question is how can this be accommodated within the JCS? We consider Wymondham and the amended Policy 9 (option b) and new Policy 9a and supportive text as set out in Matter 01 could ensure the flexibility to allow delivery in the NPA in the event of this failure.

1.13 With regards to accelerating or deferring development, there is no phasing identified at any of the settlements and no correlation between the delivery of infrastructure to the delivery of units. The only indication of phasing is set out in the housing trajectory at appendix 6 of the JCS.

1.14 The allocations set out in the JCS follow a series of SA's. However there is clear evidence that a review of the potential capacity contained within the SHLAA indicates potential capacity well in excess of the provision made to 2026. Consequently by revisiting the SHLAA additional sites could well prove acceptable, subject to testing via SEA/SA's.

1.15 There is therefore scope, within the confines of the evidence base to review the distribution between settlements, within the context of the spatial vision and settlement hierarchy.

**A4 What is meant in practice by para 6.17 (under the heading 'key dependencies') *'There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth'*. Does the JCS clearly identify such key dependencies in respect of each growth location, or effectively identify the mechanism(s) through which such dependencies will be identified?**

1.16 The JCS identifies the infrastructure issues and this is set out in the evidence base. What has not been identified is the mechanisms through which the dependencies will be identified and addressed in a manner that will allow for the growth envisaged. Version 1 of the LIPP (Appendices) does not set out adequately how each dependency will be addressed (it only identifies them) and fails to address the above concerns. We comment elsewhere on the relationship of the growth triangle to the delivery of the NDR.

**A5 Is the aim of the 3rd bullet point of policy 10 to convey the objective of ‘integrating well with neighbouring areas while also contributing to a higher level of self containment for the host town/community’?**

1.17 We would argue that the current balance and distribution of housing will result in significant effects on the Key Service Centres (as set out in Policy 14) and other growth areas in terms of settlement change and population growth. This would alter the character of such settlements and significantly increase the size of these settlements. Experian data for 2008 identifies that the current populations for some of the Key Service Centres are:

**Table 1: Potential Population Growth**

Settlement	Population <sup>1</sup>	JCS Allocation	Potential Population increase <sup>2</sup>
Long Stratton	5,357	1,800	4,320 (+ 81%)
Hethersett	5,865	1,000	2,400 (+ 41%)
Poringland	4,557	100 – 200	480 (+ 4%)
Easton/Costessey <sup>3</sup>	1,141	1,000	2,400 (+210%)
Wymondham <sup>4</sup>	14,060	2,200	5,280 (+ 38%)

1.18 Wymondham has a population of 14,060 people. This is almost all of the Key Service Centres put together. As such, Wymondham has the greatest capability to absorb growth. This is based on existing population and services available to the existing communities. It is evident above that the distribution of growth i.e. 81% at Long Stratton and 4% at Poringland is not balanced.

<sup>1</sup> 2008 Experian Ltd, Data from the Expenditure and Food Survey 2007-08 has been made available by the Office for National Statistics and has been used by permission. The ONS do not bear any responsibility for the analysis

<sup>2</sup> Based on average 2.4 people per household

<sup>3</sup> Based on 2001 Census data for Easton

<sup>4</sup> Wymondham - equates to Wards of Abbey; Cromwells; Northfields; Rustens and Town

**A6 To demonstrate compatibility with the Community Infrastructure Levy Regulations 2010, should the second sentence of policy 10 read something to the effect that “Development will achieve the highest standards of design and provide for the necessary infrastructure and services which it generates in accordance with the Community Infrastructure Levy Regulations 2010. Some of these improvements may bring knock-on improvements to existing communities.”**

1.19 The Government's policy position as to the detailed implementation of the Community Infrastructure Levy is currently uncertain and it maybe unwise to expressly tie the JCS to the current regulations.

**PART B OLD CATTON/SPROWSTON/RACKHEATH/THORPE ST ANDREW GROWTH TRIANGLE (PART POLICY 10 AND APPENDIX 5)**

**Procedure**

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

1.20 It is understood that this element of the SoFC is not to be put forward for examination or form part of the JCS (EIP 81).

**Soundness of the proposal**

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

1.21 Accepting that the proposed Strategic Allocation is not being pursued, the issue of soundness in respect of the growth proposal in NE Norwich remains a concern that the EiP needs to examine. We have set out our concerns in Matter 01 as to the risks of delivery of the NDR and the attendant implications for the provision of housing. The evidence base indicates up to 2,200 dwellings can be delivered in advance of the NDR (EIP 53 - SA update July 2010 page 10 4<sup>th</sup> bullet point). The funding of the NDR is not guaranteed and is under review. The JCS therefore needs to accommodate the possibility that the NDR is delayed or even postponed for the plan period. Notwithstanding this position, it is uncertain at this moment in

time how the GNDP intend to take forward the growth in North East Norwich. Based on the decision not to take forward the Statement of Focused Changes (EIP 81), it is expected that the changes proposed to the JCS on p62 and p105 (as set out in the Schedule of Proposed Minor Changes – Feb 2010) will be withdrawn and the term 'allocation' is also withdrawn. It is expected that North East Norwich will be required to be subject to a separate AAP or DPD at a later date. Our concerns to Appendix 6 of the trajectory by this delay are set out in Matter 02.

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

1.22 Based on the decision not to progress the SoFC for the Strategic Allocation, we have no further comments.

**Transport issues related to the growth triangle**

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

1.23 The provision of the NDR would provide an effective means of accessing the key employment and growth locations in the North East Sector. However, the delivery of the NDR is now in significant doubt with the coalition government undertaking the strategic spending review, all work on the delivery of the road has stopped. To date, there has only been ministerial support to the proposed NDR from Postwick to the A140. With the significant cuts in public sector spending expected to be announced in October it is extremely unlikely that the NDR will be allocated any public sector funding for the foreseeable future. A decision on the NDR funding could be announced ahead of the JCS Examination.

1.24 It is however possible to deliver a certain level of growth in the NE sector by the construction of the link road (or inner relief road) between the Wroxham Road and Postwick junction (i.e Plan B). This road would have restricted access points and be a good standard single carriageway link. **See appendix A.** Two sections of the link already have planning status. The northern section forms part of the White House Farm/Blue Boar Lane



development and links Wroxham Road (adjacent to Sprowston Park and Ride) with Salhouse Road (App ref 20080367). The southern section forms part of the Broadland Business Park/Brook Farm proposals. (App Ref. 20090886) The final and critical link between Salhouse Road and Plumstead Road is now available through the proposed allocation of development in the area and as a result of land sitting in the ownership of development organisations waiting to move forward and deliver sites.

1.25 The road if completed would provide an effective link for vehicles travelling towards Postwick and then onwards to the trunk road network to the south/midlands. The route will also provide a good link between the proposed growth areas and the Park and Ride at Sprowston. The link will also allow bus priority measures to be developed on one of the arterial routes into the city, facilitating the introduction of BRT in this location and linkages to the Rackheath Eco-development.

1.26 It is recognised that Postwick Junction needs to be improved to facilitate additional growth. **Appendix A pp 37-38** show a proposed alternative arrangement which was the original Stage 2 improvements that was required as part of the Broadland Park scheme. This improvement whilst not providing sufficient capacity to serve the NDR generated traffic can be designed to accommodate additional growth in the order of 3,600 dwellings on top of the existing committed development. This would include an extension to the White House Farm/Blue Boar Lane proposal, Brook Farm and the land between Salhouse Road/Plumstead Road.

1.27 These improvements are deliverable (by way of reasonable developer contributions) and would not be dependent on the release of any major public sector funding for their delivery.

**B5 The NATS implementation diagram at p61 provides a proposed pattern of public transport interchanges, bus rapid transit corridors, core bus routes, park and ride sites, and key cycle corridors. In relation to the growth triangle: (1) What degree of public transport use/modal shift is aimed for? (2) What is the programme for completing the constituent elements of NATS? (3) Is there reasonable prospect of these being implemented within a timescale in step with new development, or would the NDR tend to generate more car dependency? (4) Is the relative remoteness of the ecotown from current transport infrastructure likely to militate against high public transport useage? (5) Would an effective JCS set minimum threshold levels of public transport accessibility, allied to the progress of development?**

- 1.28 With regards to point 3, the majority of the bus routes/public transport improvements could be provided in line with the release of the development, if the NDR was constructed. The provision of the NDR will not tend to generate more car dependency as its primary function is to distribute existing through traffic movement away from the outer ring road and the key arterial routes into the city centre. This would enable the provision of bus priority measures/BRT to be introduced on the arterial routes into the city, maximising the opportunity for public transport improvements and modal shift. This would also need to be coupled with further parking control measures in the city.
- 1.29 Without the NDR the delivery of the public transport improvements to the north of the city will be severely disrupted. The provision of the Plan B Link Road would, however, facilitate bus priority measures along Wroxham Road/Salhouse Road, providing a real alternative to the private car along these routes.
- 1.30 With regards to point 4, the Ecotown is located adjacent to existing rail, however, this currently has limited capacity to move large numbers of people in/out of the city. The proposed BRT route along Salhouse Road would provide a certain level of provision. Without the NDR, Rackheath would be considered to be isolated in terms of vehicular access being dependent on Wroxham Road/Salhouse Road with no effective link to Postwick and the trunk road network.
- 1.31 The provision of Plan B would allow a certain amount of development to be released at Rackheath. It is, however, proposed that this should only follow once the development areas at White House Farm, Salhouse Road and Brook Farm are completed and the Plan B trunk road is in place.
- 1.32 Any public transport service to Rackheath would have to be heavily subsidised until a critical mass had been developed in the area. It is easier to develop a commercial service linking the development areas along the Plan B link road with both the Broadland Business Park and the city centre. The impact on the NATS of a partial delivery of NE Norwich is explored in Matter 04.
- B6 In view of the importance seemingly ascribed to the proposed ecotown's proximity to rail services at the time of its selection as such, is there any realistic prospect of significant improvement to the low level of service and the limited number of destinations currently available on the Norwich- Cromer line, or its transformation into some other form of more attractive public transport facility?**

1.33 No Comment

**Implementation issues associated with the triangle**

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

1.34 The funding to deliver the NDR is not assured and a decision will be known towards the end of October via the Governments Autumn Spending Review. A recent speech by the Secretary of State for Transport the Rt Hon Philip Hammond MP suggested that a focus of spending will be on improving existing services such as railways and concentrating on High Speed Rail (Local Enterprise Partnerships/Transport Policy Conference at Lancaster House 10<sup>th</sup> September 2010). There would still be expenditure on roads but more focussed around demand management and utilising the capacity of existing roads rather than building any new links. The JCS does not at this stage provide flexibility in order to overcome any shortfalls in housing provision as a result of non-delivery of the NDR both in terms of delivering the quantum of growth in North East Norwich or achieving the quantum of growth across the NPA. We consider our re-worded text and amended Policy 9 and new Policy 9a could provide the flexibility within the plan to ensure mechanisms are in place to deliver the levels envisaged. Furthermore, our proposed Plan B link road would also be able to deliver a greater level of development if the NDR is not delivered.

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

**limits/expectations, or should growth be more or less constrained in the absence of firm commitment to/funding of a start to the NDR?**

1.35 We have no further comment based on the decision not to progress with the SoFC for the strategic allocation.

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

1.36 We have no further comment based on the decision not to progress with the SoFC for the strategic allocation.

**Other issue**

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

1.37 Yes. Please see Matter 01 and the amended Policy 9 and new Policy 9a. Please also see Plan B proposals regarding the link road above.

**PART C OTHER MAJOR GROWTH LOCATIONS IN POLICY 10**

**Wymondham (see also matter K concerning public transport in the A11 corridor)**

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

1.38 We support the principle of identifying Wymondham as a location of for growth but consider that the level of development could and should be greater.

1.39 The JCS proposes 2,200 dwellings at Wymondham. In addition, Wymondham could accommodate part of the as yet unallocated 1,800 dwellings (see policy 4). Land at NE Wymondham can provide for 2,200 dwellings and thus meet that requirement. However, we consider that the capacity of Wymondham is greater and can accommodate a higher level of development. The SA/SEA tested 4,000 dwellings and confirmed Wymondham can accommodate this level of development and beyond. It is therefore clearly evidenced that shortfalls arising for example from a delay in the delivery of the NDR and/or, reductions in

the allocations of other settlements can be accommodated in Wymondham. Our position is detailed more fully in response to Matter 01.

**B What are Wymondham's critical infrastructure dependencies and can growth there take place within the timescale set out on p111 of the JCS? C If the JCS is unsound in relation to Wymondham, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]**

1.40 The provision of 2,200 dwellings at Wymondham does not require any specific infrastructure dependencies other than upgrading to existing infrastructure that would be resolved through the normal development control procedures and Developer Contributions. There are no 'show stoppers' in respect of the delivery of land at NE Wymondham. A planning application is in preparation to demonstrate the deliverability and merits of the release of land at NE Wymondham pursuant to the JCS. Various assessments undertaken on behalf of our client have considered the likely transport and traffic impacts, the landscape and visual impacts and infrastructure requirements.

**Transport and Traffic**

1.41 As set out in **Appendix B** our proposals would effect the A11 and the Thickthorn interchange. This is accepted and assessed with the JCS and LIPP already. Neither the Highway Agency nor Norfolk County Council as the Highway Authority have produced any modelling evidence setting out improvements required to this interchange. Our evidence submitted within **Appendix B** of this Matter and explained in greater detail in matter 04, identifies the works required to the Thickthorn interchange based on various scenarios of growth at Wymondham and elsewhere along the A11 corridor. This evidence suggests that Wymondham could indeed accommodate higher levels of growth without major remodelling to this junction.

**The LIPP and Wider Infrastructure Requirements:**

1.42 The LIPP Version 1 sets out in Appendix 3 the Priority Projects for the JCS and the necessary infrastructure to mitigate against the growth locations. The projects are split into 3 priorities:

- Priority 1 – Transport and Utilities.
- Priority 2 – Education, Healthcare and Green Infrastructure.
- Priority 3 – Community Facilities and Community Services.

1.43 The priorities are also split into three delivery periods 2008 – 2016, 2016 – 2021 and 2021 - 2026. In total (2008 – 2026) 49 priority 1 projects are identified. Of these, only 6 directly affect Wymondham namely;

- T4/T17 Thickthorn Roundabout: 2008 - 2016
- T13 Bus Priority route via Hethersett Lane: 2008 - 2016
- T14 Bus Priority Route via B1172 Phase 1: 2008 - 2016
- T14 Bus Priority Route via B1172 Phase 2: 2008 – 2016
- U6 Replacement of Transformers: 2021 - 2026

1.44 There are 50 Priority 2 Projects identified (2008 – 2026). Of these, only 6 projects specifically affect Wymondham. It should be noted that current proposals in North East Wymondham seek to deliver a number of these Projects:

- ED7 30 Pre School Places: 2016 – 2021
- ED7 2FE Primary and integrated: 2016 – 2021
- No Ref 1,200 Secondary School (tbc): 2016 – 2021
- HC7 Expansion of Existing Facilities (3 GPs and 2 Dentists): 2016 – 2021
- ED8 60 Place Pre-School: 2021 – 2026
- No Ref Expanded Secondary School: 2021 – 2026

1.45 There are 15 Priority 3 Projects identified. Due to the overarching nature of this type of project (i.e, Fire, Ambulance, Police service and Community Facilities), that are delivered on a District wide basis, it is considered that all growth locations are required to address these issues.

1.46 It is evident that there are not fundamental infrastructure constraints at Wymondham that would delay or prevent delivery of housing. The LIPP has identified the Priority Projects and the likely timeframes and Wymondham performs well in this regard. It is considered that current growth levels could be accommodated in terms of water supply and that the delivery of new education facilities would be provided by the delivery of large scale sites such as North East Wymondham which is delivering a crèche, primary school and 6<sup>th</sup> Form College as part of its proposals. The existing Wymondham sewerage treatment work has additional capacity within its existing discharge consent to serve 4,600 dwellings. However, The Water Cycle Study Stage 2b Final Non Technical Study P22 Table 4-1 (ENV 4.4B) shows that the Sewage Treatment Works will need to be physically upgraded to cater for these flows after a further 1,343 dwellings have been constructed, therefore, enabling a significant amount of development to proceed whilst the works are being improved. Many of the STWs in the NPA are nearing their discharge consents and currently unable to accept increase flows form

further development, whereas the Wymondham Works has significant additional capacity to enable further developments to be allocated in this location and in particular from the north east area in excess of the 4,000 being proposed through these representations.

**Hethersett** (see also matter K concerning public transport in the A11 corridor)

**D Does the JCS make clear, justified and effective growth proposals for Hethersett? Is it allocated more growth than suggested by its position as a 'key service centre' in the identified hierarchy of centres (see policies 14 and 19)?**

1.47 No Comment

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

1.48 No Comment

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

1.49 No Comment

**Cringleford** (see also matter K concerning public transport in the A11 corridor)

**G Does the JCS make clear, justified and effective growth proposals for Cringleford?**

1.50 No Comment

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

1.51 No Comment

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

1.52 No Comment

### **Public transport in the A11 corridor**

**Comments:** The NATS implementation plan at p61 of the JCS indicates a proposed bus rapid transit corridor running through Norwich-Cringelford-Hethersett-Wymondham. However, the summary findings of the Sustainability Appraisal state that the strategy for major expansion of a number of existing communities in South Norfolk places *'increased difficulty of achieving a degree of self-containment and providing attractive public transport options that encourage people to use their cars less'*. It observes that growth in the A11 corridor is focussed on areas *'where there should be potential to connect to Norwich via a bus rapid transit service, although it is difficult to be completely certain about deliverability/financial viability at this stage'*. Para 2.257 of the SA states that none of the growth areas under the South Norfolk distribution are of sufficient size to support a turn up and go bus service in 2021, and para 2.2.59 says that the proposal for 4,400 dwellings on the corridor is *'at the borderline'* of providing a potential market sufficient in size to support the development of bus rapid transit.

**K** In the light of the comments above, can these growth locations effectively support objective 7 on p27 of the JCS (enhancing transport provision to meet the needs of existing and future populations while reducing travel need and impact)? Is there a clear and convincing strategy to ensure that adequate bus provision will be made in line with housing growth at a stage sufficiently early to influence travel patterns? What are the expected timetables and funding sources for achieving the NATS public transport proposals for the corridor and are these likely to be delivered?

1.53 We consider growth of 4,000 dwellings at Wymondham can support the notion of the BRT (see paragraph 3.3.4 of EIP 77 NATS Implementation Plan). This sets out a requirement of 10,000 households to support a viable BRT and the anticipated growth will see this level reached. We therefore consider that a BRT could be delivered in this location and that the support of increased growth at Wymondham would guarantee that deliverability. Wymondham is currently well served by public transport and the existing population alone could support the provision of a BRT into Norwich City Centre. The proposed strategic allocation at Wymondham will provide the focus and additional funds to cover the capital cost of introducing a BRT which will then be commercially viable following its introduction. This was set out in our representations to the JCS Proposed Submission Document in December 2009 (Appendix 6 page 21).



**Long Stratton**

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

1.54 It is evident Long Stratton has been apportioned this level of growth in order to fund a bypass. This does not conform with the NATS, and can only encourage the use of the car. A more suitable distribution would be to locate a more appropriate level of growth to Long Stratton (in line with its Key Service Centre Role) and re-distribute that housing along the A11 corridor (such as Wymondham) to improve the ability to deliver the BRT and not make the current delivery 'border-line' (para 2.2.59 P25 of JCS 3).

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

**Comments:** The Sustainability Appraisal of the submitted JCS (like those undertaken at all previous stages of its evolution since 2007) identifies Long Stratton as being *'less suited to encouraging more sustainable patterns of travel...(as it is)...geographically isolated from Norwich and major employment locations in comparison with the other major growth locations and...there is little potential to deliver public transport improvements that will have a realistic chance of encouraging people out of their cars'*. It concludes that this is *'undoubtedly a significant negative effect of the strategy and probably the major issue that has been highlighted through this SA'*. Despite this the SA states that the scale of the growth at Long Stratton (as a proportion of the JCS total) is not such as to *'place in question the overall sustainability of the JCS in terms of achieving sustainable travel'*. After discussing the proposed growth as the only means of securing a bypass and its associated benefits, the SA finds it *'more difficult to say whether the local level benefits associated with growth at Long Stratton outweigh the more strategic disbenefits'*. It concludes that *'irrespective of the answer to that question there must be focused efforts to mitigate negative effects and recommends that there is justification for going further, perhaps by developing a bespoke vision for achieving an ambitious degree of self containment within Long Stratton'*.

1.55 Yes. For reasons stated above

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

1.56 No comment

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

1.57 No comment

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

1.58 For the reasons as set out already by the Inspectors in the comments above, it is clear that the evidence does not identify Long Stratton as a logical settlement to locate development when compared to other locations. This calls into question if this is the most appropriate strategy when considered against the alternatives (i.e. Wymondham) and again fails the justified test of soundness. The JCS is not effective with regards to Long Stratton, as at this moment in time, the delivery of the bypass (which is being used to justify the quantum of development) is currently not secure and there is no flexibility written into the plan that demonstrates that if the bypass is not delivered, then the delivery of 1,800 units is not acceptable. The impact of delivering 1,800 dwellings at Long Stratton without the bypass would be unacceptable to this Key Service Centre. We consider that amendments to Policy 9 and new policy 9a would provide for a contingency to the failure of delivery at Long Stratton or a reduced allocation.

### **Easton/Costessey**

**Q Does the JCS make clear, justified and effective growth proposals for this location? Can growth here take place in the form of an appropriate urban extension keyed into effective public transport connections?**

1.59 We question if the growth in Easton/Costessey can be accommodated in an appropriate urban manner. As set out in Table 1, development of this scale and nature would result in a 210% increase in the population of Easton. We consider that villages and areas with limited

sustainability credentials should only be used as reserve sites in the event of failure of delivery elsewhere.

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

1.60 No comment

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

1.61 Please see Matter 01 and introduction of flexibility into the JCS via Policy 9a.

# Matter 03

## Appendices

<b>Appendix A:</b>	<b>Plan B – Link Road North East Norwich</b>	<b>21</b>
<b>Appendix B:</b>	<b>Proposed Improvements To Thickthorn Junction</b>	<b>41</b>