

Joint Core Strategy for Broadland, Norwich and South Norfolk - Broadland Part of Norwich Policy Area Examination:

The Councils' Response to Barton Willmore's Supplementary Response to Q6 Matter 1 (ref. DV6): Sources of Alternative Supply of 7,000 dwellings.

1. Introduction

1. This document is the Councils' written response to hearings document DV6. DV6, prepared by Barton Willmore on behalf of Landstock Estates Ltd, Landowners Group Ltd and United Business and Leisure, promotes an alternative distribution of the 7000 dwellings the plan proposes in the North East Growth Triangle. The following response takes the table presented in document DV6 and deals with each row and its accompanying notes in turn. For ease of reference the response includes the relevant section of DV6 (shown in italics) to which that part of the response relates.

2. Summary of the Councils' overall response

2. The scale and distribution of growth promoted in DV6 is not supported by the Sustainability Appraisal or the background evidence prepared by the Councils. DV6 and its appendices fail to provide robust and up to date evidence to support its proposals in terms of scale and distribution of delivery, and therefore cannot constitute a credible and robust alternative to the strategy proposed in the submitted plan.

Extract from DV6: first row

Number	Source
3,600 dwellings	<i>Within NENGT by way of Create Plan B (see point note a below)</i>

Note:

- a) *Create Consulting Plan B Scenario: as set out in BW Representations to Proposed Submission JCS (Appendix 3) and figure confirmed in BW Matter 02 Hearing Statement Appendix 2.*

3. Councils' Response to this part:

3. The first point to make is that the proposed 3,600 dwellings is within the range 3,000 – 7,000, a range considered unreasonable for the delivery

of critical supporting infrastructure required for sustainable communities (for example 3,600 dwellings would not support a new secondary school). The scales of strategic growth considered reasonable in relation to critical infrastructure have already been discussed and explained and are set out in Section 4.8 on page 42 of SDJCS 3.2 with detailed consideration in Appendix K page 253 of SDJCS 3.3.

4. The second point to make is that the Create Consulting Plan B Scenario relies on (a) the delivery of an improvement at Postwick Hub junction and (b) a link road from Broadland Business Park to Sprowston Road. It would be unsound for the JCS to rely upon these proposed highway measures, for the reasons set out below.

3(a) Create Consulting's proposal for Postwick Hub

5. Create Consulting's alternative scheme of improvement to Postwick Hub is incorporated in Barton Willmore's response to the proposed submission publication (Regulation 19 representation 12420). From the evidence put forward a number of points arise.
6. The design is a sketch dating from 2010. There is no evidence that the layout has the approval of the Highways Agency, nor is it supported by evidence demonstrating that the design would be able to meet the required geometric standards. No technical evidence has been provided to justify the statement that "initial capacity modelling has shown that an additional 3,600 dwellings can be accommodated" (DV6 Plan B paragraph 4.6) through Create Consulting's alternative scheme.
7. The layout was submitted and considered at the previous Joint Core Strategy (JCS) examination in October 2010. The County Council as Highway Authority carried out a brief appraisal of the layout at that time and found that it would not operate to the required standard..
8. Since that time, alternative junction layouts have been further scrutinised as part of the work on the Postwick Hub Side Roads and Slip Roads Orders (SRO) Inquiry. The Full Statement of Case (FSOC) <http://www.persona.uk.com/A47postwick/deposit-docs/DD369.pdf> contains a consideration of alternative layouts in section 6.4.5 on page 56. The Improvement options b) and c) correspond with the layout elements proposed in the Create 'Plan B' junction improvement. As the FSOC states, these options have been dismissed as not being able to provide the improvement required. More detailed examination of proposed alternatives will be published to inform the SRO Inquiry and will be available prior to its start on 3 July 2013.
9. The Create Plan B junction improvement also requires land in private ownership to be used and from initial discussions it is understood that the land would not be made readily available. This proposal would therefore be likely to require compulsory purchase, even assuming that it was acceptable in design or capacity terms.

10. In addition, there is the issue of timing. Such an improvement would need to gain all the necessary approvals and consents before construction could start. Nor would this benefit from secured public funding, as noted in Appendix 3 of Barton Willmore's own response to the proposed submission publication (Regulation 19 representation 12420). For the reasons set out above, the alternative is not deliverable in the short term and could not constitute a short term fall back solution for the Local Plan.
11. Furthermore, the current planning permission for the Postwick Hub improvement includes the Broadland Gate Business Park which delivers the adopted JCS requirement for an extension of Broadland Business Park. The Plan B alternative would make this permission undeliverable, undermining early delivery of this important part of the adopted JCS.

3(b) Create Consulting's proposal for the Link Road

12. The link road is likely to be delivered as discrete sections.
 - (i) Broadland Business Park to Plumstead Road
 - (ii) Plumstead Road to Salhouse Road
 - (iii) Salhouse Road to Wroxham Road
13. For the link, either whole or in part, to release growth (beyond existing commitments at White House Farm) it will need to connect to an improved Postwick Junction.
14. A link road would benefit internal circulation within developments in this area but could not provide the capacity to deliver the strategic function of the Northern Distributor Route (NDR) including freeing-up road space on radial routes to enable comprehensive bus priority measures. A link road designed to serve a more strategic function if the NDR were not constructed would carry significantly greater volumes of traffic and be a major intrusion into new residential areas to the detriment of residential amenity and quality of life.
15. **Broadland Business Park to Plumstead Road** This section is identified in Broadland District Council's Local Plan (Replacement) 2006 and provides a connection between the existing infrastructure that serves Broadland Business Park and Plumstead Road. The section (on a different but acceptable alignment) is the subject of a planning application at "Brook Farm Laurel Farm" that benefits from a resolution to permit with agreed highway works and a proposed condition that requires Postwick Hub improvements to be in place. There are no approved drawings for construction of the other off-site highway works. The Brook Farm Laurel Farm application includes approximately 600 dwellings and 57,480 m² of employment development and will be conditioned to the provision of the link road.

16. **Plumstead Road to Salhouse Road:** The section is implied as future infrastructure in paragraph 2.23 of the Broadland Local Plan (Replacement) 2006, but not specifically proposed. There are no current proposals for such a link, either as part of a development application or as a road scheme in its own right. Based on likely time to gain all necessary consents and approvals, it is reasonable to assume that the link would not be delivered before 2016.
17. **Salhouse Road to Wroxham Road:** This link will be delivered alongside a permitted development proposal at White House Farm. This is the most advanced element of the link, but does not link to Postwick and in itself does not release further growth beyond the existing permission.
18. To summarise, a link road would not achieve the strategic objective of the NDR and as such would not replace the need for it as an integral part of the Norwich Area Transportation Strategy. The delivery and funding of the link road is fragmented. The link road will need to go through a process of design and approval. Elements have been through this process but other elements are only sketches. So with the work to be done it would not speed delivery of sites when compared to the current timetable for delivery of the NDR.
19. A decision on consent for the NDR is expected in about 18 months and at that time it will be very clear whether a review of the plan is needed as identified in para 7.18. It is highly unlikely that work on the alternative approach proposed by BW would have progressed so that it could deliver infrastructure to address capacity issues ahead of this timescale.

Extract from DV6: second row

Number	Source
Up to 1,800 dwellings	Located in Wymondham (see notes b and c below)

Notes:

b) *Extract of Barton Willmore's Representations to Wymondham Area Action Plan (March 2013): Extract of BW Representations (cover sheets and section 4 onwards including detailed education evidence prepared by EMF Ltd (Appendix 5) attached) relating to the ability for Wymondham to increase/provide for education capacity in excess of 2,200 dwellings.*

c) *Up to an additional 1,800 dwellings increases Wymondham's overall*

growth to 4,000 dwellings as originally tested and confirmed as suitable in previous SEA/SA options (See Technical Regulation Report STA4 P66 of 83). It also identified the delivery of a new school would be provided in Wymondham. See also EIP 96 (Committee Report 18 December 2008).

4 Councils' Response to this part

Secondary Education

20. This alternative proposal would lead to 4,000 additional dwellings being located at Wymondham, rather than the 2,200 additional dwellings that are set out in the adopted JCS. The main issue that has been raised with regard to this has been about education provision. The point made in note (c) about the Technical Regulation Report STA4 is discussed separately below.
21. The Councils have worked with the relevant service providers and responsible authorities to determine infrastructure capacity. Norfolk County Council, which is the Local Education Authority (LEA) for the area, is a member of the Greater Norwich Development Partnership.
22. The 2,200 housing capacity limit has been arrived at through discussion with Wymondham High school, which has been an Academy since 1 September 2011 (i.e. 6 months after the JCS was adopted on 24 March 2011), and with the Local Education Authority (Norfolk County Council). The evidence from Wymondham High Academy Trust is set out in a letter to South Norfolk Council, examination library reference DV4. The most recent view of the LEA is set out in a note produced in response to an application in the Silfield part of the town (DV5).
23. As the High School has Academy status, any expansion plans and ability to accommodate/admit new pupils at the school rests with the High School, not the LEA. The Academy is the admissions authority for the school,
24. The County Council as LEA takes a strategic view in assessing education capacity across the County, but it cannot insist that schools with Academy status take/admit more pupils or insist that these schools be expanded..
25. The LEA has a statutory responsibility to provide sufficient places. Therefore in the event that more housing was allocated in Wymondham, the LEA would have to find sufficient places for the children generated. With no additional capacity at Wymondham High, the LEA would have to find places elsewhere i.e. in schools in neighbouring catchments where there is capacity, or room to expand. This would involve transporting children across catchments (beyond

the reach of easy walking or cycling) and would not be sustainable or in the children's best interests.

26. The Local Plan should be supported by infrastructure planning and it is entirely appropriate for the sustainability appraisal to take account of the implications of infrastructure capacity issues. The LEA in responding to any consultation is mindful that any future development proposals/allocations should:
- Not undermine existing education provision;
 - Be deliverable and viable in terms of providing local solutions – i.e. existing school/s must be able to be expanded in situ or new schools provided, supported through developer funding;
 - Not involve having to bus children to the next set of nearest schools out of the catchment area, which would be unsustainable and not in the children's interests.
27. The evidence supports the position taken in the sustainability appraisal work that shows a practical and reasonable secondary education capacity of 2,200 dwellings in Wymondham.
28. The EMF report (appendix 5 of DV6) at paragraph 3.7 and Section 4 suggests four reasons why 2,200 dwellings is not a cap. These points are responded to in turn:
- a) *“The County’s forecasts of pupil numbers may not be correct”*;
The forecasts are robust and provide the best available evidence for long term planning. They are widely accepted as the basis for developer contributions for new education infrastructure. However, it is accepted that any forecast cannot provide a definitive answer. This underlies the need to provide a planning solution that minimises risks both for investment and the future education of students. This is particularly the case given the scale, cost and strategic role of high school provision.
- b) *“House building will not stop in 2026”*;
This plan is to 2026 and a solution to the level of planned growth has been agreed. The supporting evidence for the plan and the sustainability appraisal work relate to the planned level of growth.
- c) *“There is no evidence that Wymondham High could not be expanded further”*;
The letter from Wymondham High and note from Children's Services (documents DV4 and DV5) set out the issues and constraints to expansion beyond current plans. The EMF report seems to accept the constraints to additional expansion in paragraph 4.5.
- d) *“There are other ways in which capacity could be provided.”* - a new sixth form campus or a new high school to serve growth in both the Wymondham and Hethersett catchments (the latter includes growth

at Cringleford, and Mulbarton) are discussed in Section 5 of the EFM report.

29. Solutions to the adopted JCS growth are already in train. Phase 1 of the expansion of Wymondham High is in progress (DV5). Therefore this investment could not be used to contribute to an alternative solution. The expansion of Hethersett High is included in the application to deliver the 1200 dwelling expansion of the village (resolution to permit, awaiting sign-off of the S106). The EMF alternatives require significant investment and the identification of sustainably located sites. In this respect it should be noted that growth in Cringleford is closer to existing post-16 provision at City of Norwich School and Norwich City College than to any potential sites on the edge of Wymondham. The viability of the proposed alternatives would be undermined by the opposition from the Academy. There is no evidence provided that these alternative options can be delivered.
30. In paragraph 5.7 EMF note that the “County identifies the need for a new secondary school as being potentially triggered by 5,000 to 6,000 dwellings”. This would only provide for a school at the lower end of the scale preferred for educational reasons by the LEA and assumes that there is no competing provision that would reduce student numbers. It takes no account of dwellings that are assumed to generate no children or reduced numbers such as flats, and student or retired people’s accommodation. It also takes no account of the need to minimise risk. For these reason this scale of growth would be insufficient to facilitate delivery of a new LEA promoted high school in the Wymondham and Hethersett catchments.
31. The Councils do not consider that the points put forward change the position that reasonable alternatives should include 2,200 dwellings in Wymondham as the maximum that can be supported by deliverable infrastructure. Consequently the Sustainability Appraisal (SA) SDJCS3.2 has considered secondary education in Wymondham like other potential growth locations sites, based on the likely and reasonable assessments of education capacity and the ability to increase this.

Extract from DV6: third row

Number	Source
1,600 dwellings	<i>Remainder to be tested at additional locations within NPA e.g. Hethersett/Little Melton (see note d below) or potentially as part of a floating allocation in a subsequent DPD.</i>

Note:

- d) *Additional growth of up to 4,000 dwellings has been tested at Hethersett/Little Melton (Option 1) (STA4 p33 of 83). An additional 1,600 dwellings would result in a total growth option of 2,600 dwellings (1,000 dwellings allocated as part of adopted JCS) and therefore within the SEA/SA limits of Option 1 of 4,000 dwellings. See also EIP 96.*

5 Councils' Response to this Part

32. The proposal to increase the scale of development at Hethersett/Little Melton to 2,600 would be an increase of more than two and a half times the JCS requirement for 1,000 dwellings. The infrastructure needs of this scale of development, including the impacts on the two trunk road junctions, are unknown.
33. A further 1,600 homes on top of the adopted floating allowance in South Norfolk part of the Norwich Policy Area would increase the allowance to 3,400 dwellings and represents an 89% increase on the adopted policy. This would significantly increase the level of uncertainty in the strategy. The scale of the floating allowance was tested in the sustainability appraisal to support this part plan. Paragraphs 4.5.14 and 4.5.15 on page 36 of SDJCS3.2 consider the scale appropriate for South Norfolk and take account of the ongoing work on South Norfolk Council's site specific development plan document.
34. No evidence has been put forward to demonstrate that there are sufficient further smaller sites that are deliverable in the plan period in the NPA – including the Hethersett/Little Melton area – to sensibly provide for increased housing delivery in this part of the plan of the scale envisaged in the Barton Willmore proposal.
35. With regard to delivery, it should be noted that the total scale of development required by the JCS in the South Norfolk NPA, at 13,150 dwellings, is already greater than in the Broadland NPA at 11,100 (Table supporting JCS Policy 4). The scale of post-2008 commitment required by the JCS and located in the south-west quadrant already totals 6,100 dwellings (Wymondham 2,200, Hethersett 1,000,

Cringleford 1,200, Easton/Costessey 1,000 and 700 from the floating allowance in the emerging site specific allocations). The Barton Willmore proposals increase this by 3,400 to 9,500 dwellings. This is a significantly greater scale of development than the 7,000 proposed in the NEG and delivery by 2026 would be challenging.

The Earlier Options for 4,000 dwellings in Wymondham and Hethersett

36. The documents referred to by Barton Willmore in their DV6 notes c) and d) on the potential scales of growth at Wymondham and Hethersett relate back to the Regulation 25 Technical Consultation that was carried out in August 2008. The options under consideration were the subject of an SA at that stage, which was based on the evidence available at that time. Further work was then done, and the plan and the SA were further revised before it was submitted. It should be noted that, although, growth of 4000 homes at both Wymondham and Hethersett/Little Melton were tested in Option 1 of the Regulation 25 Technical Consultation, the distribution of growth was different to that now proposed by Barton Willmore.
37. The earlier technical consultation (under Option 1) assessed: at least 4,000 dwellings (rising to a total of at least 5,000 after 2026) in Wymondham located predominantly to the south and east of the town to ensure best access to the town centre and railway station and to maintain the strategic gap to the north and northeast; and at least 4,000 dwellings (rising to a total of at least 7,000 dwellings after 2026) in the South West Sector (Hethersett/Little Melton area. Under this option both locations eventually reached a size where an additional secondary school would be required.
38. The current SA (SD JCS 3) at this examination is a new sustainability appraisal for the remitted parts of the JCS. It is based on the more up-to-date evidence and has been carried out to inform the work on the remitted part of the plan. This includes identifying the reasonable alternatives to the policies proposed in that context, as discussed further in Chapter 4 of the SA. Appendix L of this SA ('Suitability of Individual and Combination Sectors for Strategic Scale Growth') looked at the scales of strategic growth in all the potential growth sectors, including Wymondham.