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Dear Ms St John Howe

**Town and Country Planning (Local Development) (England) Regulations 2004
as amended Planning and Compulsory Purchase Act (2004)
Joint Core Strategy for Broadland, Norwich and South Norfolk Development
Plan Document - Public Examination – Inspector’s Changes
Representations on behalf of Horsham Developments Ltd**

On behalf of our Client Horsham Developments Ltd, we write to set out our representations in response to the Inspector’s changes following the Examination in Public of the Joint Core Strategy for Broadland, Norwich and South Norfolk Development Plan Document.

Throughout the development of the Joint Core Strategy, it has always been recognised that the Northern Distributor Road (NDR) was a fundamental part of the strategy. For a single item of infrastructure, it has a disproportionately significant amount of housing and employment dependent upon it. We therefore welcome the stronger recognition of this dependency and the need to ensure that the current uncertainty over its delivery does not undermine the overall strategy.

Suggested changes to paragraph 6.18

With the above context in mind, it is important that the implications of a delay in delivery are made as clear as possible. Even if the funding were made available within the next six months – a scenario in the current funding climate which is, at best, extremely doubtful – the need for land acquisition and a possible compulsory purchase order (CPO), coupled with the application and examination process and the construction phase, would mean that it would not be operational for at least five to ten years. Many of the areas for growth in the strategy are reliant upon it providing strategic access, so could not come forward at all until it has been delivered. For employment sites this is exacerbated by the realistic lack of investor and occupier interest that sites would have without the access that it would provide.

As such, sites around the NDR can make no contribution towards housing and employment targets in the early years of the plan period. Despite this, it is important that the plan continues to provide a balanced strategy of housing and jobs delivery over this period. To provide the necessary balance,

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further flexibility needs to be built into the emerging DPDs of the respective authorities. In the case of Broadland DC, their Site Allocations DPD has already reached the preferred options stage. Yet a proportion of the development in Broadland is predicated on the NDR being in place. Such a preferred strategy must therefore be revisited to ensure sufficient flexibility is built into the delivery of the plan. This should be reflected in the proposed text.

At the end of the newly inserted text in paragraph 6.18, the following text should be added:

“Other Development Plan Documents produced by the respective districts should consider how best to appropriately reflect this additional flexibility. Draft DPDs should be reviewed in order to ensure that the appropriate level of flexibility has been built in. Where it is necessary, such documents should be revised and re-consulted upon.”

Suggested changes to text after paragraph 7.11

The suggested additional text following paragraph 7.11 is proposed to include the following:

“The NDR is fundamental to overall delivery of housing and employment growth in the Broadland part of the NPA and to significant parts of NATS including high quality public transport in the northern part of the urban area.”

This text is welcomed because it reinforces the fact that one of the major proposed strategic employment allocations in Broadland – the airport business park – cannot come forward without the NDR. This is further supported later in the text where it states:

“Delay in delivering the NDR does not prevent JCS provision of housing or employment development within Norwich City or South Norfolk Council areas, or existing housing commitment in Broadland as demonstrated in Appendix 7.”

Again this text is welcomed. The text then goes on to state that:

“The existing commitment and the range and scale of growth proposals across the JCS area provide significant flexibility to bring forward growth in those locations unaffected by infrastructure constraints.”

This statement cannot be disputed. However, the clear inference is that the proposals being advanced in other parts of the Joint Core Strategy area will be able to adequately compensate for the lack of delivery of sites dependent on the NDR. Two dangers arise from this. Firstly, insufficient flexibility will be built into plans in these areas should the NDR be indefinitely delayed. As stated above, locations reliant on the NDR have no prospect of contributing towards housing or employment needs within the first five years of the plan period. However, given the current economic situation, it is not unreasonable to consider that funding might not be secured for a further five years, so delaying the NDR until after 2020.

Secondly, the focus on growth in locations away from the influence of the NDR could result in a very unbalanced growth strategy. Indeed, there would almost become two independent strategies covering the JCS area and the economic and social linkages created by a coherent growth strategy would be lost.

The revised text should specifically identify the need for a significant level of flexibility to be demonstrated in those areas within the wider influence of the NDR. By 'wider influence' we mean the areas where there would be insufficient growth over the early years of the plan period to raise economic prosperity as we move out of recession. As such, this is not just the sites entirely predicated on the NDR, but those near to it as well.

By way of example, the airport business park could not come forward without the NDR. Therefore it could not deliver jobs, at the very least, in the first five to ten years of the plan period. This is recognised in the table accompanying the proposed text. As such, sites in the proximity of this strategic location that are proven capable of delivering both housing and employment should be given greater recognition. This includes sites in south Broadland such as the expansion of Abbey Farm Commercial Park in Horsham St Faiths. This site has been demonstrated as being capable of delivering employment in the short term yet has not been put forward in the current preferred options stage of the Broadland Site Allocations DPD. This greater recognition of the need for flexibility in the overall Core Strategy must feed through to the other DPDs.

This point is reinforced by analysis that we have undertaken of the other small sites in the Broadland LDF Site Allocations preferred options which are outside the Norwich Policy Area. The long list of sites included in this process was assessed by Broadland District Council against a range of sustainability criteria.

The Abbey Farm Commercial Park extension at Horsham St Faith was excluded from a list of preferred LDF employment sites on the grounds that growth in this location, "...is *potentially* unsympathetic to settlement form and it *could* affect the setting of both a Scheduled Ancient Monument and a Grade I listed church." Yet our analysis of the deliverability of the shortlisted sites suggests that, of the nine sites, only two have a realistic prospect of being delivered in the first five years of the plan period. This equates to an employment supply of some 22.7ha identified by Broadland BC actually only having a short term deliverable supply of 5.8ha.

Table 1 shows our assessment of the theoretical job potential on those shortlisted sites which we consider to have little prospect of coming forward over the next five years. In each case we have looked at a range of scenarios – either 100% B1c, 100% B2 or 100% B8 uses on site. This ensures that the full range of potential job creation is considered. All sites are assumed to have a plot ratio of 40% and are single storey.

For Table 1 see over

Table 1 – Assessment of theoretical job levels on sites assessed by LPP to be undeliverable in the period 2011-2016, Broadland District – sites outside NPA

		Use class			Min jobs	Max jobs
		B1c	B2	B8		
		Density (m2/FTE)	47	36		
	Plot ratio	40%	40%	40%		
Site ref	Area (ha)					
LIA 1	0.96	82	107	55	55	107
LIA 2	1.57	134	174	90	90	174
FOU 1	1.40	119	156	80	80	156
AYL 3b	0.98	83	109	56	56	109
Coltishall & Horstead 3	0.58	49	64	33	33	64
ACL 2	2.03	173	226	116	116	226
ACL 3	0.95	81	106	54	54	106
Total		721	941	484	484	941

Source: Sites from Broadland LDF Site Allocations Consultation, August 2010
 Densities from Drivers Jonas Deloitte (2010) *Employment Densities Guide: 2nd Edition*, for HCA
 The Coltishall & Horstead site totals 2.90ha but only 20% of the site is being promoted for employment uses

The table shows that between 480 and 940 jobs could come forward on those sites. In effect, this means that potentially as many as 1,000 jobs on planned sites in the part of Broadland district outside the NPA are unlikely to be brought forward over the first five years of the plan period. Only three other sites have some potential to bring forward development. This calls into question the deliverability of the emerging strategy for Broadland District.

Given the lack of certainty in the reasons for excluding the Abbey Farm Commercial Park extension from the preferred options, it is imperative that the JCS reflects the need for such documents to maximise the level of flexibility that they have. Further landscape and heritage assessment work has demonstrated that the site can be extended in an environmentally acceptable way. Also, the proposed site is a suitable and deliverable site which could start creating jobs in the short term.

If the NDR is to create uncertainty about the timescales for job creation at the major strategic sites, then it is imperative that the smaller sites do start generating jobs. This is the case for two reasons. Firstly, there will be residential development occurring in these locations and without the associated increase in jobs, this will serve to exacerbate out-commuting to Norwich which the strategy is trying to minimise. Secondly, if there is minimal job growth in the rural locations, then their economies will suffer as they are unable to grow. As we move out of a recession, the need to be able to create a range of jobs in a local area is paramount.

We trust that the Inspector will find our representations to be helpful as part of the public examination and plan making process.

Yours sincerely



Lawson Planning Partnership

cc Horsham Developments Ltd