

Representation on Draft Response to the Inspectors' questions on the distribution of growth (BP6)

Addendum to Original Submission of December 8th 2009

Summary

My representation of December 8th 2009 and this addendum note requests the Inspectors to consider the GNDP Joint Core Strategy for Broadland, Norwich and South Norfolk unsound as the proposals cannot adequately be justified. Reasonable growth alternatives to parts of the development strategy have not been adequately presented or considered and in one section specifically the evidence justifying the proposal is inaccurate. This casts doubt on other data.

In particular this representation highlights the lack of alternative development options for the south of the JCS area and deems the proposals for Long Stratton neither appropriate nor deliverable.

1. The Joint Core Strategy (JCS) is being calculatingly used to substitute for the Regional Spatial Strategy (RSS); the restrictions, directives and controls of the former being re-imposed through the JCS. The manager of the GNDP team, Ms Eastaugh, makes this clear in her letter to The Planner (17/9/10 p8) where she asks that this JCS be recognised as a replacement of a planning context shortly to be legislatively abandoned even though it suffers the drawback that its inevitably narrower context than the RSS means that its boundaries have constrained the analysis of potential growth patterns. Whether use of the JCS so swiftly and without a review of critical aspects (such as cross-border considerations) immediately to substitute for the RSS accords either with Secretary of State guidance or Government policy seeking to pass responsibility for spatial growth patterns to more local communities is in doubt
2. SNDC already recognises the JCS as “a high level strategy to set the scene for other planning documents and implementation plans”. If found sound the JCS will be embedded as a primary planning control tool. Its proposals will seriously prohibit growth potential south of its Norwich hub at the same time as the South Norfolk Local Development Framework (LDF) commences its consultation rounds where this is likely to be a major issue. The growth possibilities and options offered in the LDF will thus be considerably constrained if, halfway through its consultation process, the JCS is certified as the over-riding criteria. Public involvement in and approval of growth options and other LDF proposals will have to be narrowly channelled within the constraints imposed by those contained within the JCS. Approval of the JCS as sound will thus inhibit a wider, full and proper public local community consultation on those LDF proposals.
3. It is claimed that SNDC’s proposed Action Area Plan for Diss and the work of the “South Norfolk Market Towns Task Force” will offset any omissions of the JCS. But this cannot be correct. If the JCS is deemed sound the more detailed plans and development proposals will also be obliged to work within its dictate.
4. The proposed primary growth areas of the JCS are confined to the Norwich Area plus Wymondham, a development axis along the A11, and Long Stratton,. Areas south and north of this are left with extremely limited growth prospects. Whilst it is entirely proper that

Norwich should be considered the major growth node of the County, with possibly the addition of Wymondham, Long Stratton is in an entirely different position. Paper BP6 seeks to justify its inclusion whilst discarding or not dealing with other growth options.

5. Six alternative spatial strategy Options are listed as having been debated by elected Members. Five are discarded, including Options 5 and 6 which suggest solutions involving new communities. Option 5 refers to a new community at Mangreen, this being simply a variation of Norwich centric development. No valid alternative option exists for a greater dispersal of development, such as a growth axis south of plan area. Paper BP6 simply seeks to rationalize development of Long Stratton in addition to that of Norwich as a “vision for self-contained development” and as justification for the politically long-wanted bypass.
6. It is perfectly feasible to prepare a matching “bespoke vision” and “degree of self-containment” for other market town areas of South Norfolk and to factor them as useful contributors to growth needs, as done for the smaller and less well served community of Long Stratton; but reasonable alternatives of this character are not found in the JCS.
7. As an example the position of Diss needs considerable re-assessment. Paper BP6 in comparing Long Stratton with Diss recognises that:
 - Diss is the larger community
 - Diss has a larger service area and attracts a greater population, whilst Long Stratton’s is constrained by Norwich, Wymondham and Diss.
 - Diss has greater employment, scope for greater employment potential (the JCS allocates 10ha of extra land for employment).
 - Diss has greater retail and commercial attraction, and considerable evening attractions. (Paper BP6 even talks of developing shopping in Long Stratton so as “to regain shopping lost to Morrisons/Tesco at Diss”)
 - Diss centre has a protected medieval conservation area providing a major potential tourist attraction.
8. In comparison Long Stratton is classified as having “limited evening economic activity” and “a limited definable centre” and there is no indication in the JCS documentation that the impacts of increased development at Long Stratton on neighbouring market towns (especially Diss) have been considered by the GNDP. This is particularly important as Diss is a traditional heritage market town struggling with the economic downturn and already suffering from lack of investment in infrastructure and with none proposed in the JCS. Omission of any realistic and considered planning policy for Diss and District and the omission of any proposals for basic cross-boundary issues (such as those of natural environment and waste management) is sufficient indictment of the JCS to require it to be declared unsound.
9. It is recognised that Long Stratton does contain the administrative offices of South Norfolk District Council, one of the authors responsible for the JCS. This appears greatly to have influenced the inclusion of Long Stratton as an independent growth node. This single use alone boosts and distorts the employment figures for Long Stratton and helps to explain the untypical travel patterns into and out of the village. Whether this is justification enough to develop Long Stratton as the sole primary growth centre outside the larger Norwich Area is not developed as a planning argument.
10. Paper BP6 contains no mention of three issues that must be taken into account in determining distribution of growth and when comparing Diss with Long Stratton.
 - 10.1 A major shift to public transport is one aim of the JCS. Diss, unlike any other market centre in Norfolk, apart from Norwich, benefits from both national rail and major road links, and is the centre point on a potential growth axis from Norwich to Ipswich. The

A140 is already located outside the town development areas and bypasses the town north-south whilst half of a potential east-west bypass already exists in the A143. The railway, a primary growth generator, establishes the regional axis link of Norwich, Diss, Stowmarket and Ipswich. Diss already serves a large rail commuter population, to Norwich, Ipswich and London. Public transport to and from Diss therefore can be spread between the two modes, whereas Long Stratton relies solely on road services.

10.2 Diss forms the centre of a group of parishes which together already form a growth node. Mid-Suffolk, in its LDF, recognises the importance of Diss as a centre, taking care not to designate a competing service centre within its cross county boundary hinterland. In the last year SNDC has approved over 300 new dwellings in Diss/Roydon. The JCS refers to a further 300 dwellings over the next 16 years. This is not a reasonable assessment of likely growth, nor a beneficial use of land and community resource. There are a series of development options, on axes within and crossing County boundaries that would permit Diss and District better to contribute to the County's growth, and to add to the investment already made in its market town character and function, none of which form part of the current JCS. The JCS mentions Diss's Cittaslow classification and seems to misunderstand this as a sign that Diss wishes to live in the past. Two principles of Cittaslow are to 'Develop People-Friendly Infrastructure' and 'Enhance the Quality of Urban Fabric'. The paucity of JCS proposals for swathes of South Norfolk outside the Norwich triangle is seen as compromising these aspirations.

10.3 Nowhere in the JCS is there an assessment of benefits to be gained by designating growth patterns across County boundaries, a strategic planning omission of some gravity. Previously this was claimed to be task of the RSS but as that no longer exists it falls to the JCS to address cross-boundary issues potential even in the most minimum way which would be to assess how such potential development might affect and impact on its own land area.

11. On one point of detail, the credible evidence base of the JCS is in question by an error in the Settlement Hierarchy Topic paper (paragraph 8 on my December 2009 submission). It is claimed that Bressingham Village (a support village of Diss) was designated as an 'Other Village' (i.e. no growth allowed) as it lacks public transport provision. This is incorrect as it has allocated bus stops and bus signs and a bus service currently at four/five services a day between Bressingham and Diss with regional connections onwards from Diss bus and rail stations. An error of this nature brings into question the reliability of other JCS village classifications.

12. In conclusion, there are concerns about JCS omissions (in contrast to the imaginative proposals for the immediate area around Norwich) in relation to:

The inability to take into account wider consideration of the needs and potential of the County's border towns,

Its proposals for using Long Stratton as the sole growth centre outside Norwich-Wymondham seemingly mainly to justify that village's bypass, however admirable such a road might be

The lack of proper assessment of all the market towns for future growth and infrastructure requirements;

the lack of detailed investigation and sensitive exploration of the settlement heritage of the rural countryside outside the 'Norwich Policy Area' and specifically a policy that, by denying any growth whatsoever, condemns a large number of village settlements to decay and decline.

Until the JCS corrects these significant issues it should be declared unsound.