

Wroxham Parish Council

Clerk: Mrs. D.R.Wyatt
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2rd February 2011

Inspectors: Inspector Roy Foster MA MRTPI and Assistant Inspector Mike Fox BA
(Hons) DIPTP MRTPI
c/o Louise St. John Howe,
Claypit Hall
Foxearth
Sudbury
CO10 7JD

Dear Madam,

Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership.
Reply to Inspectors possible changes.

I wish to object to the proposed changes to the Joint Core Strategy **Policy 10 and Policy 20**. These changes do not address the issue of the soundness of the JCS and merely open the interpretation of the policies to question. We have set out the reasons for this objection below.

POLICY 10

1. The Resilience of the JCS in relation to the Northern Distributor Road

1.1 'Delivery in its entirety'

This amendment suggests that some part of the housing delivery can be provided without the Northern Distributor Road. This has never been the position of the GNDP and even at the latest meeting with the Planning Inspectors on the 9th December, the GNDP were adamant that the NNDR would be built and that it was unnecessary for there to be a Plan B. Their counter proposal was to suggest a re-scheduling of the road scheme to 2015/6. Since that time there have been a number of statements made by GNDP Principals of which the latest includes a reference to this project continuing to receive County Council funding.

The public policy has always been NO INFRASTRUCTURE – NO DEVELOPMENT, and, as described in the Key Dependencies on page 67 the NNDR is a fundamental requirement to full implementation of the JCS.

This was never fully addressed at the hearing but on the extra day developers expressed a view that some housing might be possible without the construction of the NNDR. This seemed to bring forward a concession that that as many as half the number of dwellings in the Growth Triangle (c 3000-4000) could be built without this Dual Carriageway road. That is in itself quite a leap but as can be seen other changes are planned (see new Para 7.12) which suggest that this is also the minimum to be anticipated. This is also linked to and referenced in the section dealing with Housing Delivery.

Where is the evidence to show that the transport demands arising of such a suggestion could be accommodated on the present road network. We are not aware that any work has been carried out. 3400 houses will give rise to a significant increase in the number of private cars and 5,000 additional vehicles is not an unlikely minimum in this area. We have already drawn attention to the problems which already occur at Wroxham and this proposal will seriously exacerbate the situation.

It is not logical therefore to turn an assumption into the conclusion that this would be reasonable. Our contention would be that it is not evidence based and cannot be described as sound.

Some developers challenged the need for the NNDR and pointed to the incremental improvements in the local plan as evidence that it was achievable. The issue is not that individual projects could not be accommodated but that the sum is too great to be assimilated.

The addition of this statement to the policy merely makes it less clear and raises further questions about the delivery of such a concentration of development in the Growth Triangle. The more this is exposed to scrutiny the more obvious become the shortcomings of the strategy.

Para 6.14 states that a major urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth Triangle will provide a concentration of growth which can support local services, facilities and infrastructure. We believe it has been shown that this statement is untrue, and the growth is not sustainable nor viable.

1.2 The Postwick Hub

The proposal to rebuild the junction on the A47 at Postwick had been put forward by the GNDR in order to avoid congestion on the junction. At the same time it would create a suitable starting point for the NNDR.

The way in which it was designed makes obvious that the junction was the link between the Highways Agency controlled A47 and the local NNDR.

In spite of this it was promoted as access to the Broadland Business Park. This allowed the Planning consent to be given by the District Council. Even a superficial examination shows that the junction makes access to the Business park and the eastern suburbs tortuous and inconvenient and could only have been planned in this way for the through traffic on the NNDR.

To suggest that changing this to read '*these are appropriate improvements to allow for development in Old Catton, Sprowston and Thorpe St Andrew*' is untrue and to suggest that it could be separated from the dual carriageway and still be viable is flawed. The only reason for the design would be to accommodate the additional traffic being generated by the NNDR.

The two are indivisible and Policy 10 acknowledges that.

1.3 Area Action Plan

The GNDR sought to change the Planning Process for this area as part of the Focussed Changes on which they consulted in the summer of 2010. Their plan was to cover it with a Supplementary Planning Document under which the control of development and subsequent alterations remained firmly in their control. To do that for such an extensive area and for a period of in excess of 15 years seemed quite extraordinary as local influence would be

effectively removed. The response to that consultation was overwhelmingly opposed to giving the Council such powers.

The introduction of the Localism Bill and the change of the text in Policy 10 has the impact of returning control entirely to the District Council, if this JCS is found to be sound. The subsequent DPD can only be influenced by local communities through the introduction of Neighbourhood schemes which become incremental to the LDF. There is no opportunity for communities to be further consulted or to reduce the scale of the development once the LDF is approved.

To use the blanket expression SINGLE COORDINATED APPROACH suggests that the Council has power to dictate the nature of the developments. This might be appropriate for some aspects of the overall strategy but the implication is that Council Planners will have greater powers than they currently enjoy in the present system. The experience of the way in which development has been managed in the past suggests that such an extension would be undesirable.

If the scale of development within this Strategy is approved the whole of the Greater Norwich Planning Area will be subjected to an unprecedented and unwarranted forced expansion, largely driven by providing housing for people displaced from elsewhere.

POLICY 20

1. Implementation

1.1 Timely delivery

The implication in the JCS is that the development will not outstrip the provision of infrastructure and of employment. Yet the changes proposed in these amendments do permit exactly that. What is the meaning of the word timely in this context? Does it apply to the whole of the GNDP or are we seeing the creation of an increasingly separate set of criteria for Broadland District Council. Why is the commonality of approach breaking down when a more practical eye is given to some of these concepts? Almost all the changes we have sought to resolve in the past six months have been as a result of trying to answer questions raised by issues arising over the Growth Triangle, whether this has been the sheer scale of the concentrated development, the shifting ground over sustainable housing, the uncertainty over infrastructure, questions over viability or the lack of transparency.

1.2 Where is the limit to what constitutes timely delivery?

There does appear to be a major contradiction between the final two paragraphs in the new Paragraph 7.12

Not only do the GNDP suggest that the 3,400 houses can be built in advance of the NNDR but that they will investigate the potential for further growth in advance of any decision on the building of the NNDR.

They then go on to say that using the same criteria no development beyond that number would be possible without the NNDR and that would trigger a complete review of the JCS. What is that number, surely 3,400.

We would suggest to you that we have already reached the point where a complete review of the JCS is necessary, especially for the Growth Triangle.

1.3 Policy 20 is supported by the statement that “Studies indicate that the cost of the infrastructure will exceed all expected income”. The solution being proposed by the GNDP is to rely heavily on the use of CIL provisions where the Council itself sets the level and the ultimate contributors are the local community. There has been no discussion on the level at

which this would be set but the plan is to have a standard rate across the GNDP. There is no justification for this.

POLICY 4

1. Housing Delivery

1.1 Affordable Housing

The percentage of housing which is to be provided on an affordable basis has been reduced because at a level of 40% it was clearly unviable. In the majority of cases this was borne out by the representations made at the EiP. The question is now how many extra houses will need to be built in order to deliver the implied affordable housing at some lower percentage. The table below gives an indication.

	Affordable required	40%	33%
BROADLAND	4000	10000	12000
GNDP	16000	40000	48000

The table produced by Drivas Jones Deloitte shows just how sensitive this is to the level of the market, where £250 psm will make the difference 20% based on the revised figure of one third of housing and that is between 45% and 66%, clearly a very undesirable choice to make in a market which has recently reversed its trend. It is clear that this is not sustainable without intervention.

1.2 The delivery of housing built to higher environmental standards will clearly have an adverse impact upon these figures and further prejudice the viability

NOTE

Three copies as required have today been posted.

Yours faithfully

Mrs. D.R.Wyatt
Clerk to Wroxham Parish Council.