

8223/8224/IC6

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Dear Ms St John Howe

**Joint Core Strategy for Broadland, Norwich and South
Norfolk
Public Examination - Inspectors' changes**

Thank you for advising me of the various changes proposed by the Inspectors and put forward for consultation. I have the following comments to make, on behalf of Barratt Strategic :

IC 1 Resilience of the JCS in relation to the Northern Distributor Road (RF117)

In general we are in agreement with the approach being advocated and the textual changes proposed. We would however wish to take issue with the table included in the section on contingency. This indicates that no new employment allocations will be permitted at Rackheath, or in the vicinity of the Airport, until the Northern Distributor Road is committed. We consider that this is unduly prescriptive. The subsequent paragraph indicates that the Area Action Plan for the Growth Triangle will investigate the potential for further growth over and above that shown in the table and it may indeed prove possible to release some land for employment purposes, subject to the findings of site specific transport assessments. The latter may demonstrate that in particular cases the nature of the proposed use would have no significant impact on the capacity or operation of the highway network.

In relation to Rackheath there is also the potential (as set out in the Concept Statement for the Eco-Community) for new employment uses to be rail-served which would generate different trip patterns. The large amount of construction programmed for the Growth Triangle means that it would be more sustainable if materials were brought in by rail and distributed locally. Associated land uses could include areas for some processing and manufacturing of materials, including, for example, prefabrication and concrete and tarmac batching, as well as waste recycling/reprocessing linked to the waste and energy strategies for the Eco-Community. As it stands such opportunities could be precluded by the wording in the table. In addition, the delivery of a low carbon community at Rackheath depends on the ability to provide locally-based employment to satisfy local needs. Small scale business and starter units would, for example, also be precluded by the wording in the table.

We therefore propose that the table be amended in one of two ways :

- either by modifying the header for the third column to read "development which may be constrained";
- or by adding the qualification "except where a local need can be demonstrated" after the word "allocation" in the third column.

This would provide a little more flexibility to allow sustainable development to take place, in accordance with the overall principles of the JCS and the parameters of Rackheath Eco-Community, previously agreed with DCLG.

IC 3 Policy 3 - Energy and Water

We are fully supportive of the increased use of renewable energy and are incorporating several forms of on-site renewable energy generation at Rackheath. However we question whether it is reasonable for the policy to insist upon sources of renewable energy to be provided on-site as this may not be the most sustainable approach in all cases. For example, certain sustainable methods of energy generation can sterilise land locally, leading to a poor use of development land. The thrust of the Coalition policy (set out in DECC's Annual Energy Statement of July 2010) is to remove barriers to diversified energy sources and insisting on a proportion of on-site generation could be viewed as contrary to this aim. For example, one element of the Coalition policy is to promote district heating systems where the generator need not be on site but could be some distance from the user.

In our view it is more important that contractual arrangements are in place to secure a certain proportion of energy from renewable sources. It should be the role of the Sustainable Energy Statement to demonstrate how this can best be achieved, considering a range of alternatives including the possibility of both on-site and off-site generation.

IC 6 Policy 4 - Housing delivery

We support the proposed changes to Policy 4.

IC 7 Green infrastructure diagrams

We support the inclusion of the diagrams and proposed wording changes.

Yours sincerely

**Richard Atkinson BA DMS MRTPI
Director**