

Statements on behalf of The Fairfield Partnership

**Matter 1 – (B) The spatial vision and the spatial planning objectives (JCS parts 01 & 04, including the key diagram at p29)**

**Summary**

We do not raise any issues of due process as regards legal requirements in these submissions, and therefore our response concerns Matter 1B only.

On Matter 1B, we believe the Core Strategy is broadly “justified”, “effective” and “consistent with national policy”, with the specific exception of the proposals for Long Stratton. We also raise some concerns in relation to the “effective” requirement in terms of the manner in which the JCS deals with infrastructure delivery and the ‘non-strategic/smaller sites’ allowances.

In relation to the testing of Options and the selection of the Preferred Option, we consider that there is a danger in over analysing the decision making process rather than the evidence that exists now to justify the JCS as it stands. However, in relation to Long Stratton, we note that even allowing for the possibility for the JCS to evolve over time and for new evidence to come forward, the available evidence still does not support the inclusion of this option.

For the most part, the arguments that we rely on in support of our conclusions on Matter 1 are addressed more fully in subsequent representations, in particular Matters 3, 4 and 10, and rather than repeat our comments, we cross-refer to those other statements where appropriate.

**B1 Are the spatial vision and objectives at part 04 of the JCS (and the strategy depicted on the key diagram at p29 of the JCS) justified, effective, and consistent with national policy?**

1. With the exception of the proposals for Long Stratton (covered in some detail in our representations to Matter 3), we support the spatial vision, the objectives and the key diagram.
2. Broadly speaking, there is evidence to support the scale of housing and employment growth proposed (and by contrast a lack of any substantive evidence to suggest a need for any significant departure from the levels of growth assessed under the old RSS), and evidence to link that development to certain social, environmental and physical infrastructure enhancements (although as per our representations on Matter 4, there is a need for clearer linkages between levels of growth and infrastructure to be identified to assist implementation of the Strategy). The Sustainability Appraisal should form the bedrock of the evidence base and, Long Stratton excepting, does support the broad distribution of growth proposed. On that very general basis, the Core Strategy is “justified”.
3. Again, dealing in broad principles, we believe this Core Strategy will be “effective”. In terms of housing and employment growth, we support the fact that the Core Strategy generally provides for a variety of different geographical opportunities for development, and makes provision for development across the whole spectrum of the settlement hierarchy, from

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villages in the rural areas through to the market towns, extensions to Norwich, and a new settlement. There will be a broad portfolio of development opportunities to suit a variety of market demands for both new housing and commercial investment, and although clearly the JCS is looking for delivery from all sources of supply, it is not overly dependent upon one particular geographical area or form of development, and therefore the risk of chronic underperformance is reduced.

4. Clearly in order to be “effective”, it will be necessary for the relevant physical and social infrastructure to be provided to enable development to happen, and in this respect, we believe there is a need for greater clarity on the timing and thresholds associated with certain items of ‘critical’ infrastructure, and we deal with this in our representations on Matter 4).
5. In our representations on Matter 10, we also raise some concerns regarding the effective implementation of the ‘non-strategic/smaller sites’ housing allowance for the Broadland and South Norfolk areas, where we feel that greater clarity would assist effective implementation.
6. Again, the exception that we would highlight are the proposals for expansion of Long Stratton, where we believe the Core Strategy will not be effective in delivery (or where the diversion of resources to Long Stratton may prejudice delivery elsewhere), and we consider this issue more fully in our representations to Matter 3.
7. In relation to consistency with “national policy”, and again dealing with the Core Strategy in general terms, we consider that the growth proposals comply with the broad principles of PPS3 in relation to delivery of an appropriate level of new housing to meet local needs; that the complimentary delivery of additional employment alongside housing growth is consistent with national policy on sustainable development as well as the principles of PPS4; and that seeking to ensure that new growth occurs in locations which help to minimise car-based travel and promote alternatives (whether via directing growth to the major settlements, through a new eco-town, or enhancing public transport in the A11 corridor) is consistent with PPS1 and PPG13.
8. Again, the exception appears to be Long Stratton, where the primary stated objective is to provide improvements to assist car-based travel.
9. The recent issue of a Vision for Long Stratton, which appears to be a retrospective attempt to justify growth on grounds of sustainability and reduced travel demand, does not in our view provide either a credible justification for this proposal, nor an approach that is likely to be effective, and therefore when taking in to account the non-compatibility with PPS1 and PPG13, Long Stratton appears to us to fail all three criteria of “justified”, “effective” and “consistent with national policy” – we explore this further in our submissions to Matter 3.
10. In the light of the above, we consider that the JCS should exclude references to Long Stratton and the Long Stratton by-pass in the Spatial Vision (and elsewhere).

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**B2 Was there adequate identification, consultation upon, and testing of 'reasonable alternative' spatial visions and strategies before the formulation of the submitted JCS? Is there a clear audit trail demonstrating the decision-making process by which the spatial vision and objectives of the submitted JCS were arrived at? If (in any aspect) a balance was struck between competing spatial alternatives, is it clear how and why the selected balance was struck?**

11. Examining the process by which a Core Strategy has been prepared can of course be revealing in terms of the likely 'soundness' of the content. A sudden change of direction, for example, would warrant close scrutiny, because it would be important to understand what new evidence may have come forward to justify such a change.
12. However, we would suggest that there is a danger of over-examining the details of the JCS audit trail, since subject to compliance with the basic legal and procedural requirements for preparing a JCS, it is ultimately the soundness of the contents of the JCS that is the critical issue, rather than the individual decisions that led to the content of the JCS.
13. As we have consistently pointed out, we do not agree with the proposed growth of Long Stratton. This proposal has been included within the Core Strategy despite the fact that it is entirely inconsistent with the findings of the Sustainability Appraisal, and that Option 1 performed better<sup>1</sup>. Bearing in mind the substantial weight that PPS12 places on the Sustainability Appraisal as the key part of the evidence base which supports a Core Strategy, and its primary role in assessing alternatives (para 4.43, PPS12), any decision which ignores the SA in favour of an alternative option deserves the closest scrutiny, particularly if such evidence is only brought forward late in the day and apparently to retrospectively support such an alternative approach.
14. Ultimately, however, following our approach above, the key issue is whether the evidence at Examination supports the Core Strategy as submitted, whatever the timing or circumstances of the origin of that evidence.
15. In the case of Long Stratton, it appears as if the original decision to support growth and therefore the by-pass was premised on the suggested environmental and economic benefits that the by-pass to the village would provide, but no substantive evidence on either of these issues exists to our knowledge. More recently, the justification appears to have been expanded in response to the SA to include a justification on sustainability grounds, in terms of objectives to create a more self-contained and sustainable community.
16. Even if the process by which Long Stratton was included in preference to the other originally tested options may be called in to question, if the evidence now available showed conclusively that the Long Stratton proposals were

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<sup>1</sup> On this point, we do not agree with the GNDP's subsequent explanation that inclusion of Long Stratton does not undermine the overall findings of the Sustainability Appraisal in respect of the JCS as a whole – with respect, that misses the point that inclusion of Long Stratton is not the most appropriate option in the context of clear alternatives that perform better in sustainability terms – see our representations on Matter 3.



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“justified” and “effective”, the JCS might still be sound. The problem for Long Stratton, however, as explained more fully in our representations on Matter 3, is that the available evidence still does not support that conclusion.

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**11 October 2010**