

Barton Willmore Supplementary Response to Q6 Matter 01: Tuesday 21 May 2013

Sources of Alternative Supply of 7,000 dwellings:

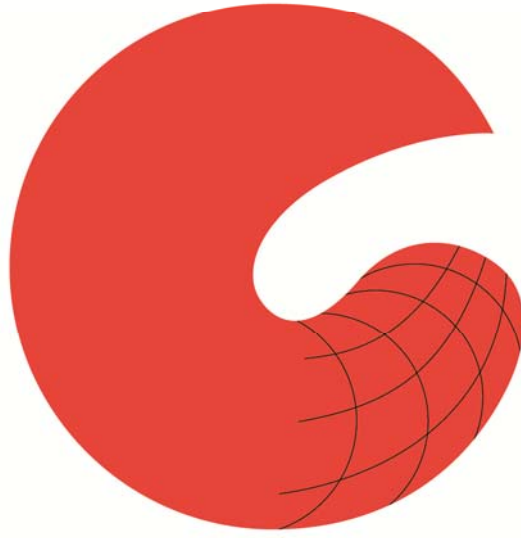
Number	Source
3,600 dwellings	Within NENGT by way of Create Plan B (see point note a below)
Up to 1,800 dwellings	Located in Wymondham (see notes b and c below)
1,600 dwellings	Remainder to be tested at additional locations within NPA e.g. Hethersett/Little Melton (see note d below) or potentially as part of a floating allocation in a subsequent DPD.
7,000 dwellings total	Total reasonable alternative options tested.

Notes:

- a) Create Consulting Plan B Scenario: as set out in BW Representations to Proposed Submission JCS (Appendix 3) and figure confirmed in BW Matter 02 Hearing Statement Appendix 2.
- b) Extract of Barton Willmore's Representations to Wymondham Area Action Plan (March 2013): Extract of BW Representations (cover sheets and section 4 onwards including detailed education evidence prepared by EMF Ltd (Appendix 5) attached) relating to the ability for Wymondham to increase/provide for education capacity in excess of 2,200 dwellings.
- c) Up to an additional 1,800 dwellings increases Wymondham's overall growth to 4,000 dwellings as originally tested and confirmed as suitable in previous SEA/SA options (See Technical Regulation Report STA4 P66 of 83). It also identified the delivery of a new school would be provided in Wymondham. See also EIP 96 (Committee Report 18 December 2008).
- d) Additional growth of up to 4,000 dwellings has been tested at Hethersett/Little Melton (Option 1) (STA4 p33 of 83). An additional 1,600 dwellings would result in a total growth option of 2,600 dwellings (1,000 dwellings allocated as part of adopted JCS) and therefore within the SEA/SA limits of Option 1 of 4,000 dwellings. See also EIP 96.

Barton Willmore
21 May 2013

Create Plan B



create
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**North East Norwich
Plan B**

NORTH EAST NORWICH

Plan B

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Reference: JPC/CS/156/01 Rev A

Date: November 2012

North East Norwich
Plan B

NORTH EAST NORWICH

Plan B

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- 156/01/003A Plan B
- 156/01/104 Postwick Improvement – Phase 1
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1.0 INTRODUCTION

- 1.1 Create Consulting Engineers Ltd has been instructed on behalf of Landstock Estates and the Landowners Group to consider the potential impact on the proposed North East Sector Growth Triangle of the non-delivery or potential delay of both the Northern Distributor Road (NDR) and the Postwick Hub. It will also consider how development could be brought forward in advance of these two major elements of infrastructure, focussing in particular on the clients land ownerships adjacent to Salhouse Road.
- 1.2 The report reviews the existing planning proposals that have been promoted in the area and their current status. It then reviews the extent of committed development in the area and outlines the proposed growth targets identified in the Joint Core Strategy GNDP.
- 1.3 The importance of the NDR and the Postwick Hub is discussed and the potential issues that would need to be addressed if these strategic road schemes were delayed or deleted.
- 1.4 An alternative strategy (Plan B) for releasing development in the North East Sector is then outlined, including how this could be delivered without any major public sector funding, including highways, drainage and services.
- 1.5 This strategy is then reviewed with respect to potential delivery rates and the level of proposed growth which could be accommodated identified.
- 1.6 Create Consulting disclaims any responsibility to the Client and others in respect of any matters outside the scope of this report.
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2.0 EXISTING PROPOSALS

2.1 Over the last few years, a number of separate development proposals have been promoted in the North East Sector, including the following significant schemes:

i.	Blue Boar Lane (Tillet Land)	Residential
ii.	White House Farm	Residential
iii.	Thorpe St Andrews – Racecourse Plantation	Residential
iv.	Land adjacent to Salhouse Road	Residential
v.	Broadland Business Park (Extension)	Employment
vi.	Brook Farm	Residential
vii.	Rackheath – Sustainable Community	Employment/Residential
viii.	Broadland Gate	Employment
ix.	Park and Ride Extension	Infrastructure
x.	Beyond Green	Residential/Employment

2.2 Blue Boar Lane and White House Farm (1,233 dwellings) have both received planning approval.

2.3 The Thorpe St Andrew – Racecourse Plantation proposal is currently at the masterplan development stage and is anticipated to incorporate to between 600 to 700 dwellings, as well as a district centre.

2.4 Both Broadland Business Park (Extension) and Brook Farm have been submitted to Broadland District Council as a mixed use development proposal. This application has been approved subject to the signing of a S106 Agreement. The housing element of the scheme allowed for 600 dwellings. This scheme is dependent on the Postwick Hub being constructed.

2.5 The masterplan for the land adjacent to Salhouse Road is currently being developed and these representations provide further detail on how this area will be brought forward. A screening application for an Environmental Impact Assessment has previously been submitted in relation to part of the development site. The proposed site is intended to provide between 800 to 1,000 dwellings.

2.6 The Rackheath Sustainable Community has undertaken pre-application consultation for a 250 dwellings which is intended to act as a first phase of the overall development of up to 4,000 dwellings.

2.7 The Broadland Gate development application allowed for 30 hectares of employment land, along with a strategic highway improvement known as the Postwick Hub. This application has been granted planning subject to the signing of a S106 Agreement. The scheme is now delayed due to a side roads order issue associated with the Postwick Hub. It is a condition of

-
- the planning consent that the new Postwick Hub interchange is constructed before development is commenced. The Inquiry into the Side Road Orders/Compulsory Purchase Orders for the Postwick Hub was due to start in September 2012. This has now been postponed until at least spring 2013 due to problems associated with the traffic evidence base in support of the scheme. It is therefore unlikely that construction will start on this proposal until early 2014.
- 2.8 The Joint Core Strategy (JCS) has identified the North East Sector as a potential location to accommodate significant housing growth identifying the area as the North East Growth Triangle. The total level of growth to be allocated in this area over and above the existing commitments is 7,000 dwellings in the period ending 2026 ultimately rising to 10,000.
- 2.9 The JCS is adopted with the exception of policies relating to the distribution of housing growth in the Growth Triangle area of Broadland. However, a legal challenge to the adoption of the JCS was received in May 2011 from “Stop Norwich Urbanisation”.
- 2.10 The High Court ruling of February 2012 found that those parts of the JCS concerning the Growth Triangle should be resubmitted for further consideration and that a new Sustainability Appraisal for that part of Broadland in the Norwich Policy Area should be prepared.
- 2.11 However, having reviewed alternative options the proposals in the re-submitted consultation documents of summer 2012 prepared by Broadland remain essentially unchanged from those previously presented. The implications are, however, that the legal challenge process has delayed the adoption of the development strategy in this part of the Norwich Policy Area. Subsequently, this has introduced further delay to the adoption of the Area Action Plan (AAP) for the Growth Triangle. The AAP will set out a “broad-brush” masterplan for the Growth Triangle potentially influencing the development proposals directions in that it will set out the broad layout and relationship of different land uses within the Growth Triangle.
- 2.12 It is, however, stated in the JCS that the vast proportion of this growth is dependent on the delivery of the NDR. Not only to facilitate the introduction of bus priority enhancements on the radial routes in the area but to also enable vehicle movements from the proposed growth areas to be distributed effectively.
- 2.13 The NDR is a Norfolk County Council (NCC) promoted scheme which has an anticipated cost of approximately £110m and will provide a dual carriageway link from the A140 Cromer Road, round to the east of the city connecting to the A47 (T) at Postwick. The current status of the proposal is that this initial phase of the scheme has received Department for Transport DfT funding subject to the granting of the necessary Side Road Orders/Compulsory Purchase Orders and planning approval. The remaining element of the NDR between Cromer Road A140 to Fakenham Road A1067 has not received support from the DfT and

NCC are currently investigating various funding mechanisms for this last section which could cost up to £40m. NCC has been over the summer of 2012 being undertaking a series of public consultations with respect to the details of the proposed scheme and its associated junctions.

- 2.14 The proposal is still yet to be granted planning permission and there has been no public inquiry with respect to the route or the various orders that will be required to secure its delivery. NCC are currently targeting the commencement of construction in 2015 with the road being open for traffic in 2017. NCC are currently considering the most suitable way for progressing the planning application for the NDR, one option is as a normal planning application using the Town and Country Planning Act procedures, another option is as a Specialist Infrastructure Project with the decision being made directly by the Secretary of State.
- 2.15 With the Postwick Hub Inquiry now being delayed and construction not effectively starting until at least early 2014, the impact of this delay will clearly affect the delivery timeframe of the NDR. It is to be noted that the objectors who successfully challenged the JCS are also generally opposed to the NDR, therefore it should be anticipated that a well thought out objectors campaign will be run at both the Postwick Hub Inquiry and any future NDR planning or CPO/SRO Inquiry.
- 2.16 With both the Postwick Hub and the NDR potentially delayed it is essential therefore that other access solutions are considered in order to facilitate the release of development whilst these two major road improvements schemes are progressed. This will provide flexibility within the plan period and will enable the housing trajectories to be achieved in the short term.

3.0 PROPOSED LINK ROAD

- 3.1 In order to provide relief from through traffic rat-running through the outer suburbs of Thorpe St Andrew along Blue Boar Lane, Woodside Road, Thunder Lane and Harvey Lane. It is proposed that a new link road should be promoted from Wroxham Road to Postwick Junction. See Drawing Number 156/01/103A.
- 3.2 The link road will connect to Salhouse Road and Plumstead Road, providing vehicles wishing to travel to and from Wroxham in the north east with an effective link, which can also act as a HGV route, relieving the Outer Ring Road and St Williams Way. The link road will be a well designed, wide single carriageway road with at grade junctions. Access will be restricted onto the road providing an effective distributor road between the radial routes in the north east.
- 3.3 The northern part of the proposed route has already gained planning approval as part of the White House Farm development proposals. The southern part of the proposed link has protected route status within the extant Broadland Local Plan as part of the original Broadland Business Park proposal and future development beyond the Local Plan period. A version of this link road was included within the recent Brook Farm/Laurel Farm scheme, however the route proposed did not follow the original protected route and passed directly through the northern section of the business park.
- 3.4 The only section of the link road which currently has no planning status is the section between Plumstead Road and Salhouse Road. The landowners in this area are all in support of the delivery of a link between the two arterial routes and are prepared to facilitate the link through their development areas. The construction of this link will provide an effective orbital link between each of the main arterial routes in the North East sector facilitating new bus routes between each of the development areas and the main employment area at Broadland Park. The new link will also provide an effective link to Postwick and the trunk road network, in advance of the NDR. Even with the NDR the link will help relieve traffic movement from settlements like Thorpe End where traffic movements will increase due to vehicles wishing to gain access to the NDR.
- 3.5 Whilst the link road will provide an important component of the internal infrastructure of the North East Sector, there are a number of development areas which could be released in advance of its complete construction, concentrating on a series of improvements along the arterial routes. These improvements would subsequently integrate with both the Link Road and the NDR when they are finally constructed. The development area located to the south of Salhouse Road could be brought forward independent of the link road being constructed. This development would ensure that its access proposals were fully integrated with any future BRT proposals along the Salhouse Road corridor. The site would be developed to facilitate the final construction of the internal link road, however, the transport strategy would concentrate on sustainable transport initiatives targeted along Salhouse Road. The

construction of the Link Road itself needs to be phased, with the final connection of the Salhouse Road to Plumstead Road link only being constructed once the Brook Farm northern link road has been completed.

- 3.6 This proposed Link Road can connect to either the Postwick Hub or an alternative interim Postwick solution if for any reason the Hub and the NDR are further delayed. The cost of this link can be provided through CIL (Community Infrastructure Levy) without any requirement for public sector funding or land acquisitions.

4.0 POSTWICK INTERCHANGE

- 4.1 The proposed Postwick Hub proposal had been specifically designed to enable the future connection of the proposed NDR, see Appendix A. The provision of this scale of highway improvement is far in excess of what would be required to secure the proposed growth areas identified in the JCS. Without the need to accommodate the future traffic flows which would be generated by the NDR, there are a number of alternative junction arrangements which can provide sufficient additional capacity to meet a proportion of the proposed growth planned for the North East Sector in advance of the NDR.
- 4.2 The original Postwick Improvement proposals developed as part of the Broadland Business Park scheme, included the widening or duplication of the existing overbridge and the provision of a new 'curly' westbound on slip which removed the conflict with the flows from the existing A47 (T) westbound off slip.
- 4.3 Since this proposal was developed, additional employment land has been proposed at Broadland Gate, as well as additional housing further in the North East Sector.
- 4.4 In order to accommodate this potential additional housing growth and to accommodate both the employment allocation of Broadland Gate and the existing and extended Broadland Business Park, an updated Postwick Stage 2 improvement has been developed.
- 4.5 Drawing Numbers 156/01/04 and 156/01/05 show proposed alternative arrangements at Postwick, which not only has sufficient capacity to serve the projected growth but can also be developed to incorporate bus priority measures to facilitate access into the city for Park and Ride buses. It would also be relatively easy to adapt these proposals to enable the future connection of the NDR.
- 4.6 Initial capacity modelling of this junction has shown that an additional 3,600 dwellings can be accommodated through the scheme, together with capacity to accommodate the outstanding committed developments and the employment sites.
- 4.7 The junction improvement requires only one parcel of land to enable delivery; we believe that this area is controlled by the same landowner who would benefit from the release of Broadland Gate scheme, therefore, having an invested interest in the delivery of the proposal.
- 4.8 The scale of the improvement is capable of being developer funded without any major public sector funds being required in order to allow the scheme to progress.

5.0 FOUL AND SURFACE WATER DRAINAGE

- 5.1 On reviewing the evidence that has been submitted in support of the JCS growth allocation in the North East Sector, new drainage infrastructure will be required to drain both foul and surface water.
- 5.2 The recently permitted White House Farm development already has an agreed drainage strategy and is utilising some of the existing capacity in the Blue Boar rising main for its foul drainage. With surface water being drained by a number of sustainable drainage features discharging into the existing drainage catchment to the north of Wroxham Road.
- 5.3 It is proposed that foul drainage from the development areas within Plan B will be pumped to Whitlingham STW. This can be achieved by initially pumping to the Broadland Business Park system. Then to upgrade the terminal pumping station adjacent to the A1042 to fully utilise the existing twin rising mains to Whitlingham STW, which were installed as part of the original Broadland Business Park infrastructure.
- 5.4 It is intended that surface water will be drained using a number of SUDS features, located within each of the development areas in a series of dry valleys. Attenuation/soakage ponds will be required to accommodate the flows during extreme rainfall events.

6.0 UTILITIES

- 6.1 The JCS outlines in Appendix 7 the various infrastructure items which are required to release development in the North East Sector. With a reduced amount of development released by Plan B it is anticipated that not all of these improvements will be required.

Electricity

- 6.2 EDF have stated that a new primary substation would be required at both Norwich Airport and at Sprowston. In order to feed both these primary sub-stations a new North East Grid station was to be developed off Green Lane to the south of Thorpe End costing £17m. It is envisaged that the now the level of growth proposed being significantly reduced that the North East Grid proposal will not be required.

Water

- 6.3 Anglian Water has confirmed that they can supply sufficient water to serve the proposed development areas. Initially water is to be taken from the existing source boreholes at Thorpe and Colney. It is therefore not envisaged that there will be any programme or cost restrictions in relation to the delivery of a suitable water supply which would prevent Plan B from coming forward.

7.0 SUSTAINABLE TRANSPORT

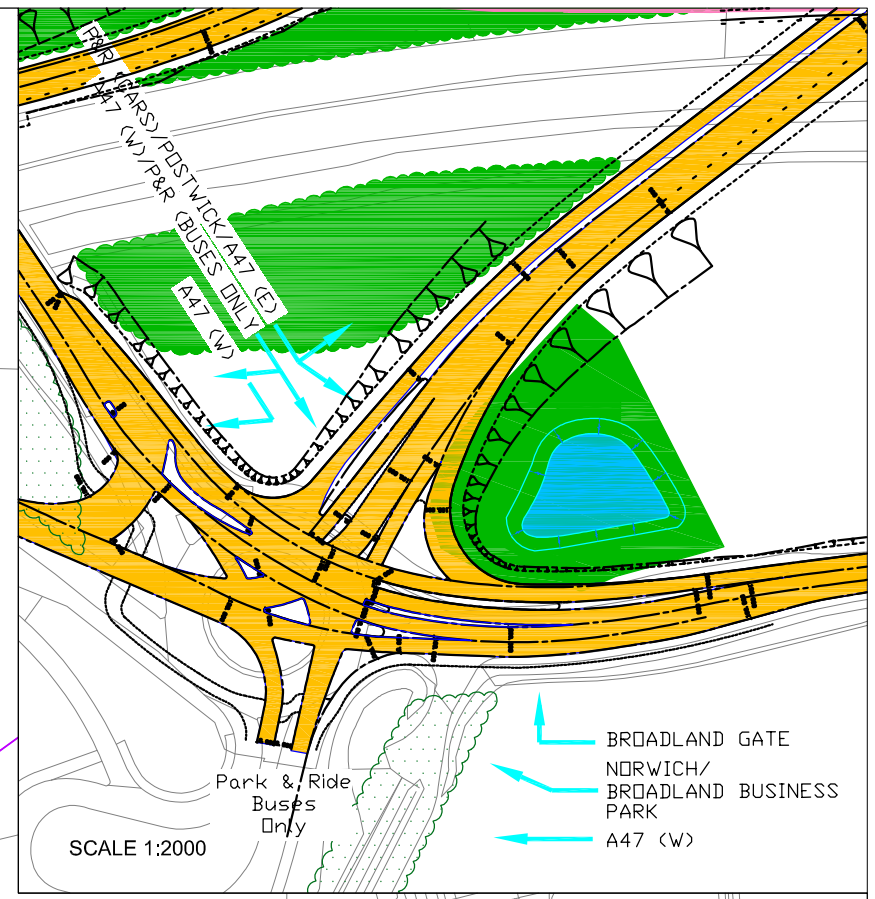
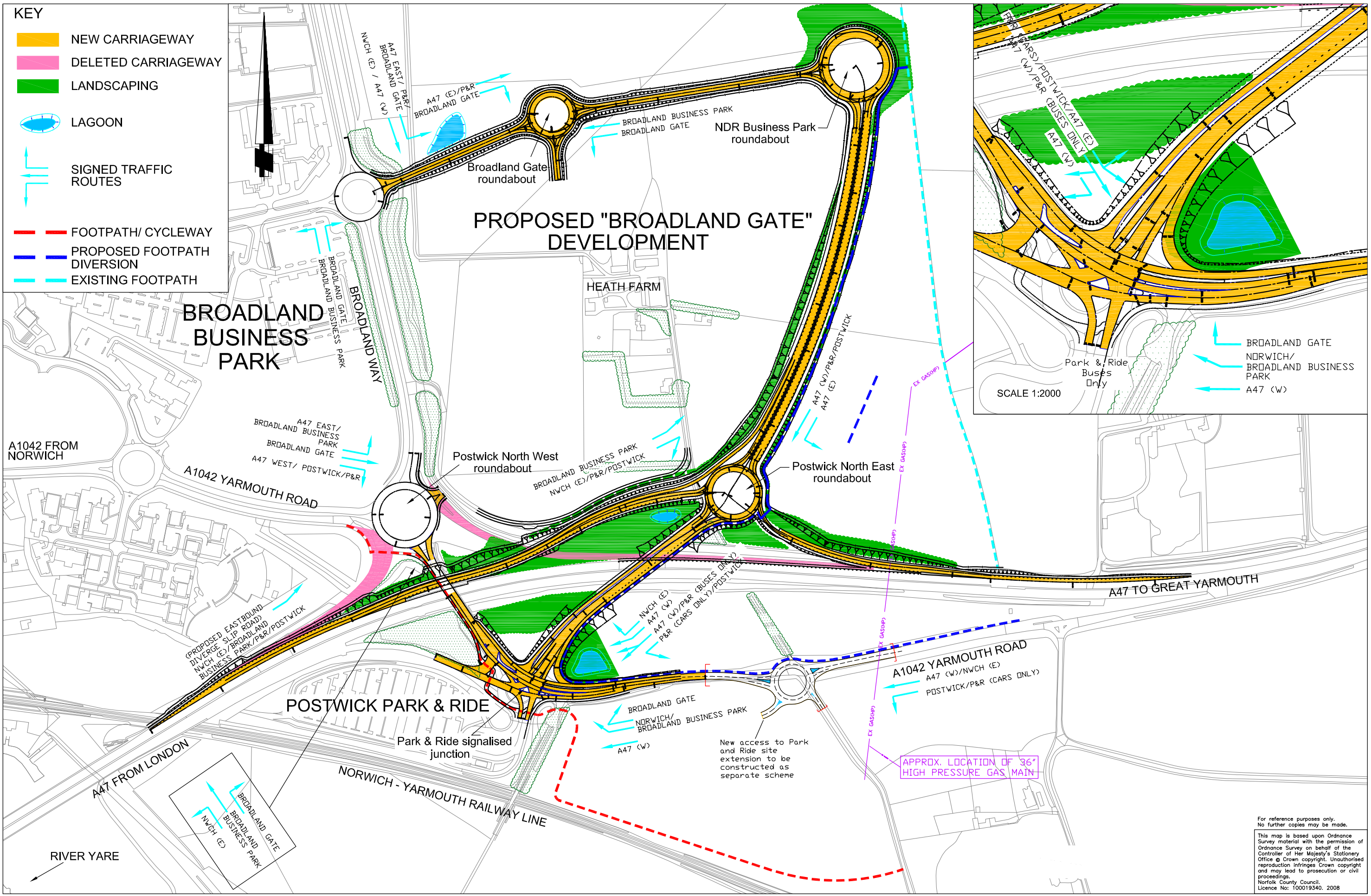
- 7.1 One of the key aims of the NDR was to remove traffic from the existing radial routes and to enable bus priority and other sustainable transport initiatives to be introduced. The provision of the Plan B link road will provide substantially the same relief between Wroxham Road and Postwick junction.
- 7.2 The Link Road will provide an effective corridor for an orbital bus service linking the employment areas to the north of the city, with the growth areas in the North East Sector and the employment areas at Broadland Business Park. The link will also enable better access to both the Sprowston and Postwick Park and Ride facilities.
- 7.3 It is intended as part of the Plan B scheme that a BRT should be developed along the Salhouse Road. This could be ultimately extended out to Rackheath, with the first phase introducing bus priority measures along the existing Salhouse Road corridor. Bus priority can be introduced at the existing junction with Blue Boar Lane, as well as the outer ring road adjacent to Sprowston Retail Park. It would also be possible to introduce a bus lane along this route, within existing highway. The final section of the route into the city would involve using Gurney Road through Mousehold Heath.
- 7.4 The improved bus measures would be integrated with existing bus services already in this area. The new service would incorporate high quality vehicles, with real time passenger information being provided along the route, giving both details of bus times and available seat capacity. The level of service is proposed to be increased to a ten minute frequency along this route.

8.0 SUMMARY

- 8.1 Although the NDR has been identified as a critical element of infrastructure to deliver the full level of growth proposed in the North East Sector. An alternative Plan B strategy which is not dependent on public sector funds can release a significant proportion of the proposed housing, in the order of 3,600 dwellings over and above the existing commitments.
- 8.2 The construction of a Link Road between Wroxham Road and Postwick will enable an orbital public transport services to be developed along with a new HGV route. This Link Road would connect each of the proposed new residential areas with the employment area at Broadland Park. The route will also provide an effective link to Postwick and the A47(T) in advance of the NDR, as well as diverting NDR bound traffic away from some of the settlements such as Thorpe End.
- 8.3 Whilst the Link Road would enable a significant amount of growth to be released in the North East Sector there are areas of land which can come forward independently of this link. Land to the south of Salhouse Road could be released for development in advance of the proposed Link Road and the NDR/Postwick Hub. The development of this land would be facilitated by a series of sustainable transport initiatives along the Salhouse Road corridor. This would include facilitating the introduction of BRT in each of its junction proposals, as well as allowing for the future connection of the link to Plumstead Road.
- 8.4 The Sustainable transport measures such as the Salhouse Road BRT could be implemented and the extension of the Postwick Park and Ride could also be released, all in advance of the NDR/Postwick Hub.
- 8.5 The proposed alternative Plan B improvements at Postwick can be readily brought forward and funded by CIL contributions and would not be dependent on large scale public sector finance being required. This scheme could also be easily adapted to enable future connection of the NDR, without any abortive work.

APPENDICES

APPENDIX A



- KEY**
- NEW CARRIAGEWAY
 - DELETED CARRIAGEWAY
 - LANDSCAPING
 - LAGOON
 - SIGNED TRAFFIC ROUTES
 - FOOTPATH/ CYCLEWAY
 - PROPOSED FOOTPATH DIVERSION
 - EXISTING FOOTPATH

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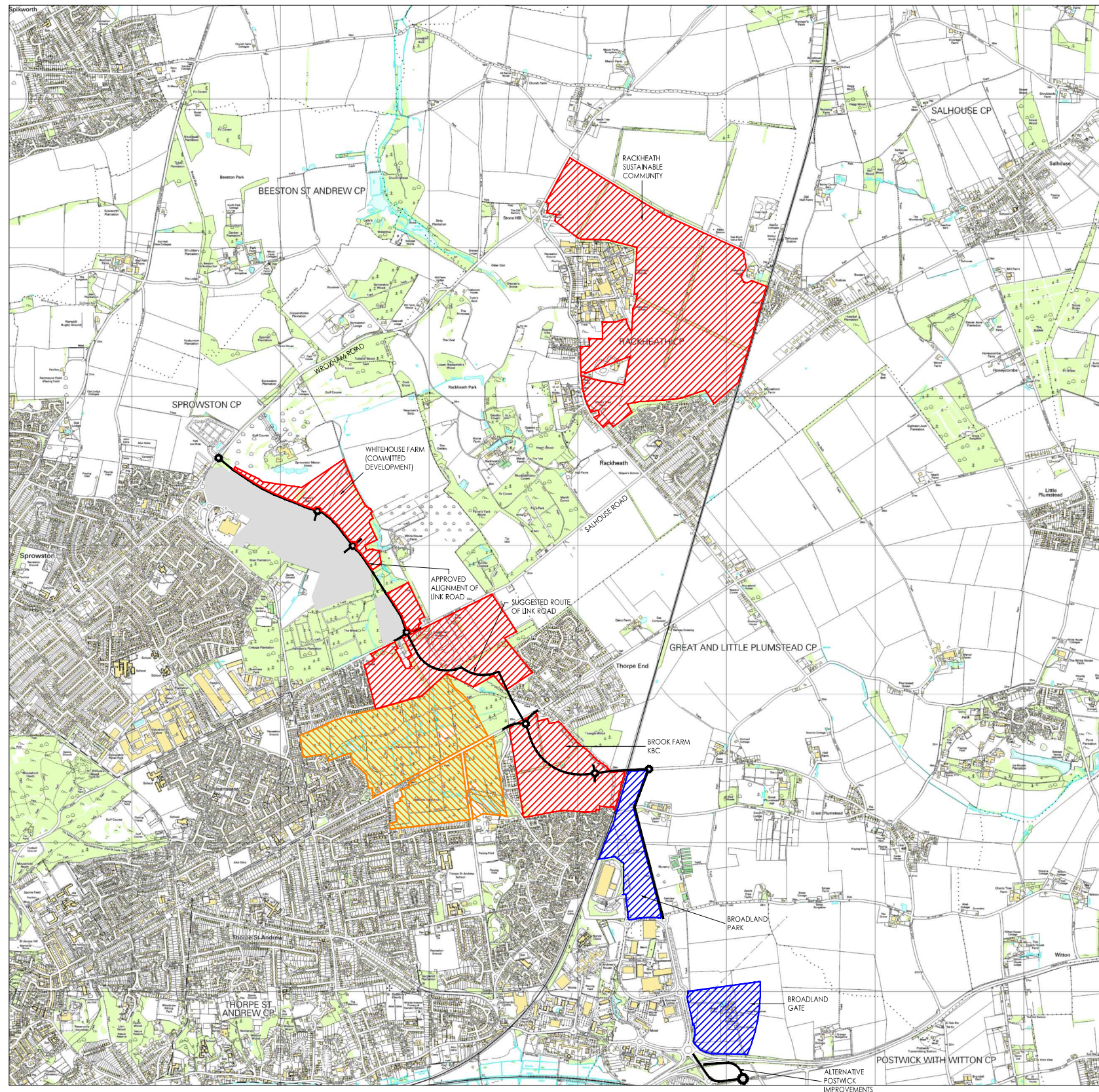
Mike Jackson
 Director of Planning and Transportation
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DRAWING TITLE
 NORWICH BROADLAND GATE DEVELOPMENT
 POSTWICK JUNCTION - OPTION 10DD
 JUNCTIONS AND ACCESS ROADS - FIGURE 4.2

REV.	DESCRIPTION	CHECKED	DATE
C	Postwick model updated, P&R roundabout updated		03/08
D	Cycle routes & footpaths added	RM	05/08
E	New Access to Broadland Gate - Postwick North West R/B	RM	07/09
F	Signed Traffic Routes Changed	RM	07/09
G	Access to BG from NW r/b modified	RM	08/09
H	P&R Signalled Junction Layout Updated	CA	10/09

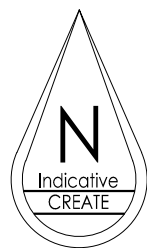
SURVEYED BY	INITIALS	DATE	DRAWING No.
OS		2008	R1C093-R1-1285H
DESIGNED BY	INITIALS	DATE	PROJECT TITLE
NCC		01/09	Norwich Northern Distributor Road
DRAWN BY	INITIALS	DATE	SCALE
DB		01/09	1:NTS
CHECKED BY	INITIALS	DATE	FILE No.
PD		01/09	R1C093

PLANS



KEY:

-  PROPOSED HOUSING LAND
-  COMMITTED DEVELOPMENT
-  COMMERCIAL/EMPLOYMENT LAND
-  LOW DENSITY HOUSING - APPROXIMATELY 650 DWELLINGS

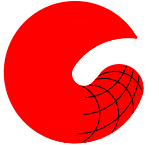


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REV	DATE	AMENDMENT DETAILS	DRAWN	APPROVED
A	01.11.12	MODIFY LAND PARCEL/LINK ROAD ALIGNMENT	MDA	JPC

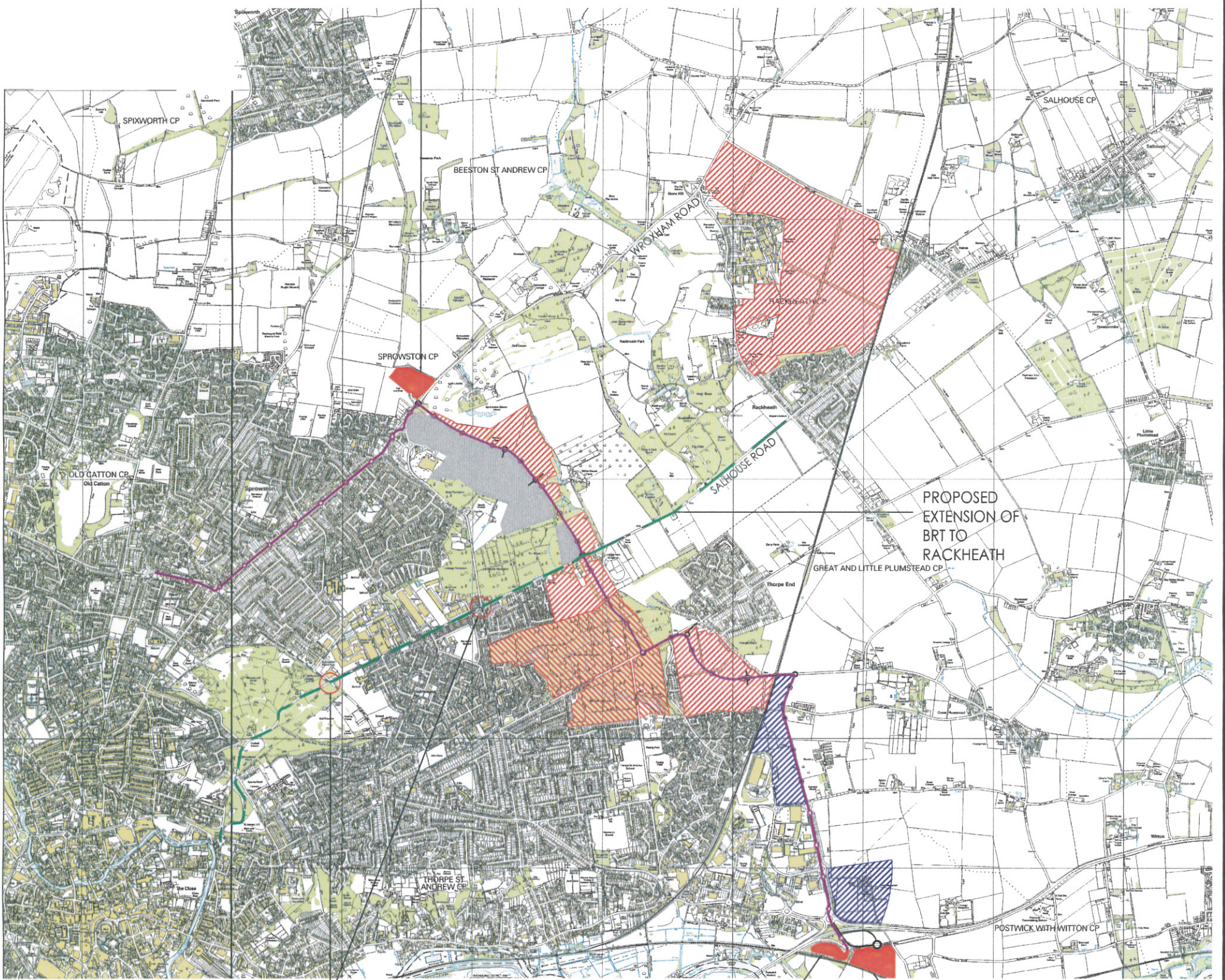
Telephone: 0845 450 7908 Fax: 0845 409 4520

PROJECT SALHOUSE ROAD NORTH EAST NORWICH, NORFOLK	DATE 06.10.10	DRAWING STATUS INFORMATION	
	SCALE(S) NOT TO SCALE	DESIGNED JPC	DRAWN MJN
DRAWING TITLE PLAN B	CHECKED JPC	APPROVED	 create CONSULTING ENGINEERS LTD
CLIENT LANDSTOCK ESTATES LTD AND LANDOWNERS GROUP	JOB No 156	DRAWING No 01/103	
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ORIGINAL SHEET SIZE - A3 Landscape
DO NOT SCALE



SPROWSTON PARK
AND RIDE



PROPOSED
EXTENSION OF
BRT TO
RACKHEATH

BUS PRIORITY AT
EXISTING JUNCTIONS

POSTWICK PARK AND
RIDE

EXTENSION TO POSTWICK
PARK AND RIDE

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KEY:

- - - BRT ROUTE
- o - ORBITAL BUS ROUTE

PROJECT SALHOUSE ROAD NORTH EAST NORWICH, NORFOLK	DATE	DRAWING STATUS	
	08.10.10	INFORMATION	
DRAWING TITLE PLAN B - SUSTAINABLE TRANSPORT	SCALE(S)	DESIGNED	DRAWN
	NOT TO SCALE	JPC	MJN
CLIENT LANDSTOCK ESTATES LTD AND LANDOWNERS GROUP	CHECKED	APPROVED	
	JPC		
JOB NO	156		
DRAWING No	01/106	REVISION	-



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ORIGINAL SHEET SIZE - A3 Portrait

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Extract from BW Wymondham Reps

**SOUTH NORFOLK COUNCIL
LOCAL DEVELOPMENT FRAMEWORK**

**WYMONDHAM AREA ACTION PLAN
2nd PUBLIC CONSULTATION
(Reg. 18) PREFERRED OPTIONS**

**REPRESENTATIONS SUBMITTED
ON BEHALF OF
LANDSTOCK ESTATES LTD,
LANDOWNERS GROUP LTD and
UNITED BUSINESS AND LEISURE (PROPERTIES) LTD**

MARCH 2013

**BARTON
WILLMORE**
Planning · Design · Delivery

**SOUTH NORFOLK COUNCIL
LOCAL DEVELOPMENT FRAMEWORK**

**WYMONDHAM AREA ACTION PLAN 2ND PUBLIC CONSULTATION
(REG 18) PREFERRED OPTIONS**

**REPRESENTATIONS SUBMITTED ON BEHALF OF
LANDSTOCK ESTATES LTD,
LANDOWNERS GROUP LTD
and
UNITED BUSINESS AND LEISURE (PROPERTIES) LTD**

MARCH 2013

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Date: 22 March 2013

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APPENDICES

Appendix 1: Inspector's Matters and Questions for Examination of the Broadland Part of the Norwich Policy Area Part of the Joint Core Strategy

Appendix 2: Cogent Land vs Rochford District Council and Bellway Homes (September 2012)

Appendix 3: Inspector's Report for Ashford Borough Council

Appendix 4: BW Technical Paper on Commitments

Appendix 5: Report on Education Capacity and Growth in Wymondham

Appendix 6: Report on the Gap between Wymondham and Hethersett

Appendix 7: Transport and Infrastructure Assessment

Appendix 8: Emerging Masterplan for Land at North East Wymondham (ref 18618 13V)

4.0 EDUCATION CAPACITY

- 4.1 The following section assesses the issue of Education capacity and refers to question 9 of the WAAP consultation document. It is evident that the preferred approach by SNC is to 'cap' growth in Wymondham to 2,200 dwellings. The principal justification for this is the size of the local Secondary Education facility (Wymondham High School), which is considered to be at capacity at the point at which 2,200 dwellings (including windfalls) is reached and unable to be expanded. Therefore any additional houses delivered over and above 2,200 dwellings will result in an unacceptable impact on education infrastructure which cannot be addressed. We consider this artificial ceiling to development wholly 'unsound' and would result in a WAAP that is not being **positively prepared**, or **justified** as it is not based on any robust evidence base.
- 4.2 There is presently no evidence base as to why Education capacity caps housing growth at Wymondham to 2,200 dwellings (even though the JCS housing figures are expressed as a minimum and not a maximum). The evidence base released by SNC as part of this current consultation provides no information on education and therefore no robust evidence. The education reason has also been cited in the Site Specific Allocations DPD to justify why Wymondham has not received any part of the 'floating' 1,800 dwelling allocation under JCS policy 9. Moreover, there is no published strategy that considers the education needs arising from the NPA housing requirement and how that should best and appropriately be met. Policy 9 of the JCS expressly provides for the provision of additional education capacity.
- 4.3 The only identifiable evidence base relating to the capacity of Wymondham High School is located within Appendices 1 and 2 to a report of 11th June 2012 Cabinet Meeting. At this meeting it was discussed how the 1,800 'floating' allocation would be distributed, as well as the progress of the WAAP. Within Appendix 2, reference is made to Wymondham High School as stating:

8. Wymondham High School

Overall growth of Wymondham needs to be capped at 2,200 houses or a new secondary school will be required as current academy site can only just cope with the 2,200 houses. Growth beyond this will require a more radical solution."

- 4.4 However, it is apparent that this position was only reached following a comment provided by the High School itself, rather than from the Education Authority. As such, it is apparent that SNC has based its Spatial Strategy in relation to Wymondham High School on an inappropriate evidence base, i.e. a single representation from the High School.

4.5 Furthermore, the principle that additional education cannot be delivered in future years as a result of growth is not a sound one. In practice, Norfolk County Council (as Education Authority) assesses education capacity at the strategic level both as part of the JCS and as individual planning applications are made. If it is established that there is indeed a requirement for additional educational capacity, this is sought by way of developer contributions (or in future CIL contributions). Therefore, the capacity of education facilities is constantly evolving and should not cap growth and any specific level. This is especially in the light of where a spatial strategy sets housing targets that are a minimum, and where there is not a demonstratable 5-year housing land supply in the NPA.

4.6 NCC's Education department has assessed the future education capacity requirements and has confirmed that extra capacity will be made available at the appropriate location at the appropriate point in time. **Appendix 05** provides a report prepared by our specialist Education consultant (EFM Limited) that has carefully and thoroughly assessed this position. It concludes that:

- The County has a statutory duty to ensure a sufficiency of school places. It is inappropriate to suggest it is the County's role to support, or oppose, a particular amount of housing development.
- There is clear evidence that the County envisages demand from 2,200 dwellings in Wymondham can be met in a particular way. There is no evidence that an alternative number of dwellings has been given serious consideration.
- Wymondham High School is currently oversubscribed. Information about current school rolls and capacities indicate the need to provide additional capacity to meet needs arising from the existing population and from new housing in the future.
- There is no evidence that the County could not fulfil its statutory duty in the event that more than 2,200 dwellings were allocated to Wymondham.
- Even if the County's figures future forecasts prove correct, and it is not possible to expand Wymondham High School beyond the capacity envisaged, there are still other ways of adding additional secondary school capacity to Wymondham.

4.7 Furthermore, the 'cap' to growth is not in accordance with the adopted JCS which clearly sets out in Policy 9 that the figures are a minimum. As such, the WAAP is not consistent with the JCS's spatial strategy for Wymondham. The lack of conformity is further evident when

account is taken of the wording of Policy 10. The penultimate bullet point, under the heading 'Wymondham', states:

'new pre-school provision and a new primary school. Secondary education provision remains to be resolved but may require the relocation of the existing high school to a new site'.

- 4.8 The wording in the JCS is clear that 'education provision remains to be resolved'. It does not state that growth will be capped because of education capacity and this was not the basis as to why Wymondham was allocated 2,200 dwellings (as a minimum) in the JCS. It is therefore essential that SNC seeks to proactively resolve the issue of secondary education capacity rather than use it as a justification to limit growth in Wymondham. To this extent, Section 7 of these representations demonstrate that an educational facility can be provided on Land in North East Wymondham that would resolve this issue.
- 4.9 The acknowledgement in the JCS of the need to resolve education capacity clearly demonstrates that SNC has been aware of this issue for a number of years and have taken no action to resolve the matter. However, it is not for the DPD process to resolve the education issue but rather a matter for Norfolk County Council as the local education authority (LEA) under its statutory duties to ensure a sufficiency of school places to meet the needs of the population in its area. Likewise, it is not for the LEA (or Wymondham High School) to set the growth strategy for Wymondham. Therefore, educational capacity cannot be a planning justification for setting Wymondham's housing growth as a maximum.

5.0 DELINEATION AND APPLICATION OF THE GAP

5.1 The JCS sets out that in promoting good design, *'development proposals will maintain important strategic gaps'* (Policy 2). In relation to Wymondham, Policy 10 states *'at least 2,200 dwelling located in a number of sites providing easy access to local jobs, services and facilities and the town centre whilst maintaining the strategic gap to the north and north east and the historic setting of the town and abbey'*. It should be noted that the JCS does not state 'no' development in the strategic gap, nor does it define where the strategic gap is. The Council has instructed Chris Blandford Associates to prepare an evidence base that:

- examines the Strategic Gaps/Important Breaks proposed in the Site Specific Policies and Allocations Document, including that between Wymondham and Hethersett;
- justifies each of the proposed Strategic Gaps/Important Breaks in terms of their function;
- clearly defines and justifies the precise boundaries/extents of each proposed Strategic Gap/Important Break, only including land that can clearly be demonstrated to achieve the aims of the Strategic Gaps/Important Breaks policy;
- identifies any necessary changes to the existing boundaries/extents of the Strategic Gaps/Important Breaks;

5.2 This has been instructed in order to protect the setting and separate identity of settlements, avoid coalescence, and retain the existing settlement pattern by maintaining the openness of the land. This report is now published and the Council relies upon it in preparing the WAAP.

5.3 Whilst we welcome the intention to create a robust and credible evidence base to define the gaps, we disagree with the current delineation as set out in the Chris Blandford Associates report. Further, we are concerned that the evidence base, such as it is, is not being applied consistently across the NPA and in preparation of the other DPD/AAPs in relation to other settlements (Hethersett, Easton and Cringleford). **Appendix 06** of this statement provides an analysis of the Strategic Gap between Wymondham and Hethersett prepared by The Landscape Partnership. It concludes that:

- The Local Landscape Designations (LLD) review has used two basic principles to identify whether or not it is appropriate to designate an area as Strategic Gap. Such land should 'A' help avoid coalescence, and 'B' maintain the openness of land, thereby retaining the existing settlement pattern. We consider that avoiding coalescence and

maintaining openness are appropriate attributes of Gap policy, but that retaining existing settlement patterns is not.

- Many of the comments made in the LLD review regarding parcels of land relate to maintaining only openness, and not openness AND separation. As such, it would be more appropriate to protect such land from inappropriate development via countryside policies, not gap policies.
- Many of the comments made in the LLD relate to maintaining the setting of Wymondham and Hethersett, and would be equally true of many other parcels of land in the vicinity of the two settlements.

5.4 The Landscape Partnership has undertaken a series of desktop and field based studies to establish a more appropriate delineation of the Gap that best define the land required to fulfil the function of the Gap. Particular regard was given to ensuring that “only the land that is strictly necessary to fulfil the essential purpose of a Strategic Gap/Important Break gap” was included within the Gap. The redefined Gap is illustrated on Figure 3.11.3 of **Appendix 06**.

5.5 The key amendments proposed through the TLP footprint for the Strategic Gap to that propositioned in the WAAP by Chris Blandford Associates are:

- exclusion of land to the west of The Wong/north of Carpenters Barn site – such land cannot be demonstrated to fulfill any separation function
- exclusion of the properties and gardens on the southern side of the B1172 – such land cannot be demonstrated to display the quality of openness
- consideration of an alternative western boundary to the Gap south of the B1172 that does not undermine the separation of Wymondham and Hethersett or compromise the openness of the countryside

5.6 Notwithstanding the current delineation of the Gap as set out by Chris Blandford Associates, there is only a small parcel of land in the northern part of the Site that would be located within the Blandford Gap. As a result, the Gap as defined by Blandfords between Wymondham and Hethersett is maintained, and we therefore question the robustness of the SEA/SA process and how SNC came to its preferred options.

5.7 For instance, Questions 11, 12 and 13 of the current WAAP consultation (albeit question 13 relates to infrastructure capacity rather than environment) follow a paragraph on ‘the consideration of reasonable alternative sites’. This is the only paragraph that considers

alternative sites and only refers to large developments in the north or west as having a 'far more damaging impact on the historic setting of the town and abbey'. It should be noted that there is no mention of Gap here.

- 5.8 The only reference to Gap is contained on p26 of the WAAP document which refers to South Wymondham sites and 'Reason for selecting as preferred option'. Within this text it states that 'Large scale development in this location will be less visually intrusive than the other areas around the town and will not affect the historic setting of the town, views of the abbey or the strategic gap between Wymondham and Hethersett'. We wholly disagree with the conclusion that our clients' Site in North East Wymondham will adversely impact on the Gap. Figure 3.11.3 of **Appendix 06** details where we consider a more robust Gap boundary should be located.
- 5.9 When a consistent approach is taken to the other allocations (something that SNC has failed to do), it is evident that other 'Gap' locations are being considerably more affected by proposed new development as a result of the JCS. This is particularly prevalent in north Hethersett where SNC has resolved to grant permission for 1,000+ dwellings (2011/1804/O), and in Cringleford, where a further 1,000+ dwellings are being identified all located within Gap as defined by Blandfords. It is therefore considered that the 'protection' being afforded to the Wymondham and Hethersett Gap is much greater than other areas that are identified as 'Gap'. Therefore an inconsistent approach is being taken by SNC in this instance especially as the protection of the Gap is considered one of the principal reasons why 'Land at North East Wymondham' has not been taken forward as a preferred location within the WAAP.

6.0 DELIVERABILITY OF THE WAAP

- 6.1 This section of our Representation details the concerns relating to the 'deliverability' of the WAAP, and therefore the ability of SNC to meet its overall housing target within the plan period. WAAP consultation questions 11, 12 and 13 are applicable.
- 6.2 The WAAP, as drafted, itself identifies that the allocation of 1,200 dwellings in South Wymondham is dependent on the delivery of the necessary infrastructure relating to the Railway Bridge. We are aware of two planning applications (2011/0505 and 2012/0911), which have been with SNC for determination for 12-24 months and are aware that the capacity of the Railway Bridge is a potential 'showstopper'. Notwithstanding, it is of further concern that SNC has elected to identify its preferred site, in the knowledge that the ability to deliver this housing south of this constraint is questionable. Furthermore, it has not put into place any flexibility (i.e. a reserve site), if South Wymondham does not deliver. Notwithstanding Question 13, on the basis that South Wymondham is allocated, it is our view that a **positively prepared** plan would at least allocate a reserve site to cover such an eventuality in any event.
- 6.3 This position is somewhat reflective of SNC not having undertaken an 'issues and options' consultation, and, the inadequacy of a credible evidence base to support the WAAP preferred sites. Any evidence base needs to be rigorous and robust. This is lacking at present.
- 6.4 **Appendix 07** details a specialist technical report prepared by Create Consulting Engineers which highlights the infrastructure capacity issues in Wymondham. It identifies Wymondham Rail Station being well below the national average in terms of use; that land to the South of Wymondham will need to direct highway traffic through the restricted railway bridge; and that the BRT is not proposed to extend into land identified to come forward in South Wymondham.
- 6.5 Additionally, it is evident that there are serious questions over the ability for South Wymondham to overcome its infrastructure issues (a) in a timely manner and (b) in a manner that would still render this site deliverable and viable (as set out in NPPF para 173). The lack of identification of an alternative site within the WAAP is unsound, which is further emphasised by SNC unsound approach to:
- The quantum of development in Wymondham relating to the 'floating' 1,800 dwellings;
 - The approach towards windfall development and retrofitting allocations; and,
 - The current deliverability concerns of the WAAP and South Wymondham.

- 6.6 It is considered that if South Wymondham continues to be identified as a preferred option, then 'Land at North East Wymondham' must also be identified. It is considered that the identification of the Site would also not only provide for flexibility within the WAAP itself in the event of failure of South Wymondham, but also if other locations, subject to growth in the SNC NPA and the NPA as a whole, also begin to fail and as such, the overall housing target in the plan period continues to be threatened.

7.0 SUITABILITY OF LAND AT NORTH EAST WYMONDHAM

7.1 'Land at North East Wymondham' ("the Site") has been promoted throughout the various stages of the Joint Core Strategy and SNC consultations on site specific DPD/AAPs. The Site represents a sustainable development that will meet the objectives of the JCS, and deliver a significant level of housing that will also meet the objectives of the NPPF in not only working towards a 5-year supply of land for housing, but also 'boosting significantly the supply of housing'.

7.2 The previous sections to this representation has set out our concerns as to the soundness of the document. This includes:

- The lawfulness of the process with which SNC is progressing its DPD/AAPs/Neighbourhood Plans and the consequences of progressing each in isolation in terms of compliance with the SEA/SA regulations;
- The treatment of windfall sites and meeting the overall housing requirement in the plan period;
- The artificial ceiling that is being set by an inadequate and incorrect assessment of educational capacity;
- The delineation of the 'Gap' definition in North Wymondham;
- The concerns over the deliverability of the WAAP itself.

7.3 As a result of the above soundness concerns, we consider that additional land needs to be identified and allocated within the WAAP in order to rectify the current deficiencies and make the WAAP sound. 'Land at North East Wymondham' is considered a 'deliverable' site in a sustainable location which can:

- a) Contribute to ensure the housing need is being met across the NPA and the DPD/WAAP/Neighbourhood Plans allocate sufficient sites to meet the housing target in the plan period;
- b) Could act as either an 'allocation' or a 'reserve allocation' (i.e. an alternative site) in the event that South Wymondham, or any other areas or DPD/AAPs/Neighbourhood Plans in the NPA or across the NPA as a whole fail to deliver the appropriate level of housing.
- c) Can meet and implement the JCS Spatial Strategy and Wymondham specific policies by:

- proactively addressing the issue of education capacity;
- resolve the Tuttle Lane roundabout infrastructure constraints that will benefit the whole of Wymondham;
- maintaining the Gap between Wymondham and Hethersett;
- contribute to the successful delivery of the BRT; and,
- introduce a Country Park incorporating the Ketts Oak Tree itself.

7.4 **Appendix 08** identifies the emerging Masterplan for 'Land at North East Wymondham'. It updates previous masterplans to reflect the latest planning permission granted for the site known as Carpenters Barn. The Masterplan has been informed by technical reports assessing points of access, Sustainable Urban Drainage Systems, existing and enhanced ecology and the wider landscape setting.

7.5 The Site currently comprises approximately 193ha and extends north of Tuttle Lane and Norwich Common as well as a parcel of land opposite the Waitrose Superstore. The Site could deliver the following:

- Up to 1,600 residential dwellings;
- A retirement village (with existing consent)
- Up to 33% Affordable Housing (potentially up to 528 Affordable Homes based on 1,600 dwellings);
- Average density of 29dph but with variation throughout the site including low density along the perimeter of the Site and increased densities towards the centre and mixed-use areas;
- New Primary School to serve the development;
- New 6th Form Educational Facility (or similar) to serve Wymondham and the wider community and thus provide additional capacity at the existing High School;
- Potential Mixed Use area that could include employment;
- Local Centre appropriate in scale to the number of housing and not impacting on the Town Centre;
- Provision of extensive areas of open space including a Town Park and Country Park incorporating the Ketts Oak tree where new footpaths will be provided linking into the development and the town whilst maintaining a newly defined gap between Wymondham and Hethersett ;
- Provision of formal sports pitches;
- Sustainable Urban Drainage Systems;
- Enhanced Landscaping and Ecological benefits;
- Provision to link with the Bus Rapid Transit (BRT);

- New access points on Tuttle Lane and Norwich Common;
- New roundabout arrangement at Tuttle Lane and the A11;

7.6 The Site is wholly deliverable and could contribute to the short term 5-year housing land supply position as well as the longer term delivery of housing in the NPA. It is therefore a suitable alternative, or additional site, to those that have been preferred within the WAAP.

7.7 **Appendix 07** sets out an Assessment that identifies the benefits the delivery of the Site in North East Wymondham can achieve, as well as it being suitably located to existing services. This report demonstrates that:

- The Site is deliverable and is the best location within the Wymondham area for a further significant release of residential development. The indicative site masterplan demonstrates how a development in the order of 1,600 dwellings over and above existing committed housing development to the north of the town centre can be planned as part of a multi-faceted development layout.
- The Site is ideally located when considering existing travel patterns and future transport solutions. It is far better located to enable an integrated sustainable development to be brought forward when compared to any other site presented for future housing development in the current WAAP consultation.
- The Site is within easy walking and cycling distance of the single largest employer in the WAAP consultation area also the town's single largest retail offer and surrounding residential development. Additionally, the town centre is readily accessible from the Site by bus, taxi and bicycle.
- Wymondham rail station fails to adequately serve the town on account of its existing format and location and the uptake of travel by rail for journeys to work from Wymondham is represents only one-third of the national average. With Wymondham rail station remaining in its existing format and location, the greatest potential for more sustainable travel to/from Wymondham realistically lies with bus-oriented public transport.
- The prime location of the Site offers its future residents real possibilities to travel more sustainably by bus including BRT. Additionally, no site in the WAAP consultation is in closer proximity to the major economic generator Norwich and no site rivals it on accessibility to the A11 trunk road.

- The strategic highway improvements associated with the Site are readily deliverable and could assist significantly in delivering the local section of the proposed BRT scheme.
- The Site is located clear of any potential flood risk areas and surface water drainage can be managed within its area boundaries to prevent any increase risk of flooding to adjoining developments and downstream landownership's.
- The site can be served by all of the main utilities and any identified offsite reinforcements works can be delivered within a timeframe that would not prevent the planned phased release of development.
- The existing Wymondham Sewage Treatment Works has sufficient capacity within its current discharge consent to deal with the increased foul flows from the Site. Upgrade works however will be required as the scheme develops to provide the increased treatment capacity and AWS have stated that this will be provided to ensure that the development can be released on a phased basis. A new sewer will be constructed from the site to Wymondham STW.
- In view of the above there no services and drainage issues which would prevent the site coming forward for residential development. In addition, there are sound transport and accessibility reasons supporting the case for the Site to be included as a preferred major housing allocation in the emerging WAAP.

7.8 The WAAP evidence base has also assessed the Site as part of its SEA/SA process both within Appendix 4: Site Assessment Tables (Site refs: 1015/0567/1026²) and within Appendix 5: Appraisal of Housing Options (ref. North Wymondham). In each case, the conclusion is that the Site is appropriate for further consideration and consequently it must rank as a reasonable alternative.

7.9 Appendix 4 provides for a traffic light system of which sites have been assessed against the topics listed below. The Interim Sustainability Appraisal identifies that a designation of Red = potential conflict; amber = potential neutrality and green = potential compatibility:

² It should be noted that site 1015 covers a larger areas than currently proposed and has not been amended to reflect the submission of previous emerging masterplans. In addition, sites 0567 and 1026 now both benefit from planning permission.

- Location Principles
- Existing Land Use Policy
- Undeveloped
- Landscape/Townscape
- Ecology/Biodiversity
- Other Material Considerations.

7.10 In total, there are 39 columns contained within the matrix as well as a 'comments column'. There is no other background evidence which supports the colours contained in the matrix table. Whilst the 'traffic light' approach is a simplistic descriptive tool of showing the results of the Council's assessment, it must be founded on a robust and credible assessment methodology, having regard to the relevant statutory provisions. Unfortunately, SNC has failed to supply or gained any other evidence base other than that contained in pages on their website that supports these tables and the assumptions made therein. There is no supporting information demonstrating why a site was awarded a particular score or 'colour' for a specific category, nor is there any subsequent 'ranking' of the 'best' or optimum sites. It is therefore impossible to assess SNC's conclusions to determine if the assumptions made by Officer's and its Members are sound and reflects the evidence base.

7.11 Notwithstanding the above, the matrix presently identifies that the Site (i.e. site ref 1015), performs well when tested against these criteria with 24 no. columns identified as 'green', 11 no. columns identified as 'amber', 4 no. columns identified as 'white' and 0 no. columns identified as 'red'. It is therefore concluded that there are no 'potential conflicts' identified.

7.12 Whilst the comments column provides some particularly negative commentary in relation to the site, many of the comments refer to the scale of the site, which are not relevant in the context of needing to allocate sufficient land to meet the JCS requirements. In addition, they appear not to warrant any topics classified as 'red' within the columns.

7.13 Appendix 5 assesses 'North Wymondham' as a potential development location. It again identified 0 no. red columns and in respect of assessment against the Spatial Objectives states that:

'Major growth in North Wymondham will bring positive social benefits in terms of providing much needed housing. Policies in the JCS seek to ensure that developers provide a mix of new housing with at least 33% being affordable. Concentrating growth in one location makes it easier to deliver services and facilities to support growth, in particular a new primary school.'

7.14 In relation to the overall conclusion, Appendix 5 states:

'Although putting major growth in North Wymondham would have some landscape impacts these could be outweighed by the potential social and economic benefits of one large housing development. North Wymondham has the advantage that it is close to employment benefits but has the disadvantage that it is more remote from the town centre. It has the potential to be well served by BRT, if the planned scheme goes ahead.'

7.15 Whilst we agree with some of the above conclusions, we do not agree that it is anymore remote from the town centre than other potential sites in the Town. It should also be noted that the SA does not suggest that North Wymondham is in an unsustainable location.

7.16 It should also be noted that when the SA of South Wymondham is scrutinised, the conclusions contained in Appendix 5 for the Spatial Objectives are the same as North Wymondham. When the overall conclusion is reviewed, it states that South Wymondham would '*have some environmental impacts*'. It is therefore considered that from an SEA/SA perspective, North and South Wymondham area perform equally well when assessed against each other, and thus both sites are suitable to come forward for development if required in the WAAP or to meet the overall JCS Spatial Strategy.

7.17 It is therefore considered that 'Land at North East Wymondham' performs well against the SNC's SEA/SA. Consequently, it can be relied upon as a future allocation in the WAAP to accommodate development to meet the needs of the local community.

8.0 CONCLUSIONS

8.1 These representations are submitted on behalf of Landstock Estates Ltd, Landowners Group Ltd and United Business and Leisure (Properties) Ltd in response to the South Norfolk Council's (SNC) consultation on its 'Wymondham Area Action Plan 2nd Public Consultation (Regulation 18) Preferred Options (WAAP).

8.2 It is considered that the process in which SNC is presently pursuing its DPD/AAPs/Neighbourhood Plans is 'unsound and could be unlawful. No SEA/SA has set out an assessment testing 'alternative strategies' in relation to implementing Policy 9 of the JCS. This specifically relates to the 'floating' 1,800 dwelling allocation.

8.3 However, we consider that this could be 'cured', by undertaking the following actions:

- Halting the progress of the WAAP but also the Site Specific Allocations DPD, the Long Stratton AAP and the Cringleford Neighbourhood Plan until the outcome of the JCS examination is known and any consequences on the overall JCS spatial strategy; and
- Aligning the timetables for the Site Specific Allocations DPD/AAPs/Neighbourhood Plan timetables in order that all these DPDs are examined together, or at least, core session(s) on core principles; and
- Undertaking an independent Addendum SEA/SA process to assess reasonable alternative strategies; and
- Consulting upon the findings of the Addendum SEA/SAs; and (if needs be)
- Undertaking a WAAP 'issues and options' consultation; and
- Re-issuing the WAAP (and the other DPDs) for consultation.

8.4 The WAAP is seeking to retrospectively 'allocate' sites that have been permitted since the base date of the plan period (2008). As a result, only 1,488 new dwelling allocations are proposed to be made in the WAAP. If retrofitting is applied throughout the District, we consider the overall housing target will never be met as neither the existing deficit in housing will be rectified (by departure applications) nor will sufficient land be allocated to meet the identified strategic needs of the JCS.

8.5 The WAAP presently seeks to limit growth to 2,200 dwellings in Wymondham as a result of the perceived capacity of Secondary Education. We consider this is not in accordance with the JCS or NPPF in seeking to boost significantly the supply of land for housing. Additionally, the LEA has a statutory obligation to provide sufficient education capacity in any event.

- 8.6 The WAAP is not being consistent relating to the matter of 'Gap' as other settlements in the District. This includes land to the north of Hethersett and land to the south of Easton and west of Cringleford. We do not consider the WAAP to be consistent with other Area Action Plans or DPD's or Neighbourhood Plans in preparation within the SNC NPA.
- 8.7 We consider that insufficient housing numbers have been allocated to Wymondham and that a figure in excess of 2,200 dwellings should be applied (and therefore additional allocations need to be made). The WAAP acknowledges the deliverability issues of the preferred sites to the south of Wymondham. This being the case, the WAAP needs to be **flexible** to provide for and allow alternative sites to come forward in the event that the required infrastructure set out in the JCS cannot be delivered. This could also address the implications of a review of the overall spatial strategy.
- 8.8 The current WAAP is therefore not being **positively prepared** (as it is not possible to identify if the overall strategy will meet objectives and its approach to education capacity), is neither **justified** (as reasonable alternatives have not been tested) or **effective** (the deliverability of part of the WAAP is in doubt) and is not **Consistent with National Policy** (as it is not in accordance with the NPPF requirement to allocate land that will deliver the overall housing requirement in the plan period).
- 8.9 'Land at North East Wymondham' has been tested by the current SEA/SA process and there is no material difference in the conclusions made in North East Wymondham to South Wymondham (the preferred options). As such, North East Wymondham presents an appropriate and suitable location to accommodate future development to meet the demands set out the JCS and the NPPF.

Appendix 5:

Report on Education Capacity and Growth in Wymondham

Report

The Implications of Development on High School Facilities in the Wymondham Area of Norfolk

For
Landstock Estates Ltd,
the Landowners Group and
United Business and Leisure (Properties) Ltd

20 March 2013

JAN KINSMAN
C Eng, MICE, BSc(Eng), ACGI

The Implications of Development on High School Facilities in the Wymondham Area of Norfolk

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1 Introduction

1.1 EFM (Education Facilities Management) Ltd has been commissioned by Landstock Estates Ltd, the Landowners Group and United Business and Leisure (Properties) Ltd to review the high school (secondary) education capacities (years 7-13) likely to be required as a result of development proposals in the Wymondham area for the period ending 2026.

1.2 EFM is an experienced consultancy which provides advice on planning obligation matters to landowners, developers, their planning advisers and, on occasion, local authorities. In this respect, the main focus of our work is on school place planning although we are also involved in other planning obligation matters from time to time. This report has been prepared by Jan Kinsman who is an Associate Director of EFM and whose background includes having been Hertfordshire County Council's Planning Obligations Manager. By way of further background we annex to this report our Practice Briefing Note on School Place Planning.

1.3 EFM has been asked to report in particular on the matter of whether there is a limit to development in Wymondham that arises as a result of the education implications of development on high school education facilities.

1.4 We understand that it has been suggested that a limit of 2,200 dwellings arises as a result of a limit on the capacity of Wymondham High School. The adopted Joint Core Strategy identifies Wymondham for growth of at least 2,200 dwellings.

2 Overview

2.1 Norfolk is a two tier local authority area. Norfolk County Council (the County) has responsibility for ensuring a sufficiency of school places to meet the needs of the population of its area. This duty arises under Section 14(1) of the Education Act 1996 and, like other local authorities with this responsibility; the County has various powers that it can use to assist in the carrying out of its duties. The Committee Version (29 October 2012) of the Wymondham Area Action Plan (WAPP) states on page 19 that, *"Any proposals to exceed the 2,200 houses will need support from Norfolk County Council in terms of education provision."* This is an inappropriate statement, as it is the County's duty to respond to education needs however created; and it cannot be placed in the position of determining whether or not development is acceptable on the basis of education provision. We note this statement was omitted in the Consultation Version.

2.2 The need for local education authorities to provide extra school places can arise from demographic change and is not always associated with new housing. In recent years there has been considerable pressure placed on primary school places in many parts of the country due to rising numbers of births. Norfolk is no exception and identifies that the number of births in the

county have increased steadily since the historically low figure in 2001¹. Reports to members on school place planning matters recognise that both new housing pressures and changes in existing populations need to be considered.

2.3 At a county level pupil numbers in secondary schools are expected to remain fairly static until about 2015/16 when pupil numbers are expected to begin to rise, following the increases seen in primary schools. Primary school pupil numbers are expected to continue increasing steadily during the period through to 2018/19, by about 14% from present levels, when they are expected to level off². These figures do not include specific allowances for new housing other than sites with planning consent.

3 The Situation in Wymondham

3.1 Members of the County's Children's Services Overview & Scrutiny Panel have considered a series of reports about the supply of school places and the implications of pupil number growth, most recently in January 2013. The January 2013 report identifies that the various districts in the county are at different stages in their local planning processes, including the introduction of two Area Action Plans in South Norfolk District. In this report the emerging planned development figure for South Norfolk District is given as 10,580 and Wymondham is noted as being required to cater for 2,200 dwellings – these figures are not fixed at this stage, of course.

3.2 So far as high school education provision in Wymondham is concerned, the main school is Wymondham High. This school serves both the town itself and a substantial rural area beyond; and its eight feeder primary schools include Barford to the north and Tacolneston VC to the south. The number of pupils on roll in January 2012 was 1620, substantially in excess of its formally assessed capacity of 1410³. About five kilometres to the southwest is Wymondham College, which is unusual in that it provides places for boarders as well as day pupils, and does not have a defined catchment area. Priority for boarding places gives high priority to children whose parents are in HM Forces and have a need for boarding. Both schools have sixth forms and were oversubscribed for September 2012. A similar distance to the northeast is Hethersett High School and Science College, which caters for pupils aged 11-16 (i.e. it has no sixth form facility) and was undersubscribed in September 2012.

3.3 Along "the A11 corridor", beyond Wymondham College is Attleborough High School, and beyond Hethersett High School are a group of high schools that serve the southwest of Norwich city, the closest of which is the City of Norwich School.

3.4 With the exception of Hethersett High School, which had about 70 spare places in January 2012, the schools named above are all operating close to or above their assessed capacity. Some may be attracting pupils in from other areas, and there are spare places in some schools within the

¹ <http://www.norfolkinsight.org.uk/jsna/population>

² Report to Children's Services O&S Panel 12 January 2012

³ <http://www.education.gov.uk/edubase/establishment/summary.xhtml?urn=137461>

city, but looking at the situation overall it appears reasonable to accept that extra places will be required to meet the needs of the existing population together with additional needs arising from new housing.

3.5 We understand from informal discussion with staff at the County that a strategic masterplan for the development of Wymondham High has been developed with the school. The plan does not appear to be a public document, but we understand it will require significant investment of about £13m and will raise the total capacity of the school to provide for over 2,000 pupils in due course.

3.6 We also understand it is this strategic masterplan which leads to the assertion of South Norfolk Council that a 2,200 dwellings provision ceiling exists for Wymondham. This is a misunderstanding of the County's position. We acknowledge that the County considers demand from 2,200 dwellings can be met by expansion of Wymondham High, but that is not the same as saying that additional housing could not be catered for. As noted above in paragraph 2.2, it is the County's responsibility to ensure a sufficiency of places. We do not believe the County is saying that it could not fulfil its statutory responsibilities were a different amount of housing considered acceptable; and we have found no evidence that the County has been asked to consider an alternative figure.

3.7 In any event, the assertion that 2,200 dwellings is a maximum figure is misguided for the following reasons:

- a) The County's forecasts of pupil numbers may not be correct.
- b) House building will not stop in 2026.
- c) There is no evidence that Wymondham High could not be expanded further.
- d) There are other ways in which additional capacity could be provided.

4 Accommodating Future Growth

Forecasts

4.1 The County's forecasts of likely demand may not be correct - and in fact they are likely to be wrong. This is not a criticism of the County's figures, but simply recognition that whilst being a best estimate at a particular point in time they depend on many factors which vary over time. Forecasts are updated annually to ensure that school place planning is based on the best available information at the time. Forecasts further into the future are likely to be further out than forecasts for the next year, as errors will tend to be compound by the assumption that past trends will continue into the future.

4.2 The precise basis for forecast pupil numbers at the Wymondham High has not been set out in any public document that we have been able to find. The County does not routinely publish its school by school forecasts, and the countywide figures given in reports to its Overview & Scrutiny Panel only extend to 2021/22. Beyond this date, assumptions have to be made about birth numbers as well as many other factors. Annex 1 to the report in January 2013 shows high school numbers on an upward trend through to 2021/22 before allowing for new housing other than that with an existing consent.

House Building

4.3 Accepting that new housing will lead to increased demand for high school places, even if the County's figures are exactly correct and nothing will be able to be done to provide more capacity at Wymondham High, there is no likelihood that house building will stop in 2026. At some point in time, whether it be 2027 or earlier or later, additional high school places will need to be provided one way or another.

Potential to expand Wymondham High

4.4 According to the County, work has now started on a £2.5m phase of improving the school's facilities, including replacement of temporary mobile accommodation and new facilities for science, art and history⁴. We understand this is part of the current masterplan for the phased improvement of the school, but we do not know whether these works will increase the capacity of the school to match its current number on roll. Nor have we found any evidence that the full programme of works, expected to cost £13m, is a firm commitment at this stage.

4.5 We have not been able to find information about the background to the school's masterplan, or information about the limitations of the site that might preclude further expansion in due course – although we understand the site area is a significant issue, such that the current site area is well below that which would normally be expected for a school of its current size.

4.6 A further possibility would be to move and expand Wymondham High onto a new site, although this is unlikely to be financially viable due to the costs of replacing existing capacity unless the existing school and its facilities could be put to a viable alternative use.

Other Options for Providing additional Capacity

4.7 Expansion of Wymondham High beyond the currently envisaged masterplan capacity of 2,040 pupils is not the only means by which further capacity could be made available. Other options include:

- a) Making provision at another school, and possibly changing the catchments areas to align demand better with capacity. It is not clear at present whether Wymondham High is a net

⁴ <http://www.norfolk.gov.uk/News/NCC120535>

exporter or importer of pupils. It might be possible for Wymondham College (which is situated in the Wymondham High catchment area) to be expanded, and it already appears that demand for boarding places may be reducing – as the maximum intake for boarders is being reduced from 92 for September 2012 to 75 for September 2013. The priority for admission as a day pupil (after looked after children, siblings and three specialist aptitude places) is decided on nearness to the school.

- b) A separate sixth form facility could be developed on a new site. This could free up capacity on the Wymondham High site for 11-16 provision. It can be noted that in relation to proposed housing at Hethersett and Cringleford (totalling some 2,400 dwellings including an additional 200 at Hethersett) the County envisages significant expansion of Hethersett High School⁵. This is despite the view being expressed that the Hethersett High School site is constrained and expansion would be difficult⁶.

As noted above in paragraph 3.2, Hethersett High School does not include a sixth form, and it is not clear from the information we have seen how it is intended sixth form provision would be made. A new sixth form facility at Wymondham can address that potential shortfall.

- c) A new school could be established in Wymondham. This might provide an alternative to some of the expansion works proposed at Wymondham High and perhaps Hethersett High School, and could be a more cost effective way of providing places. In October 2012 the DfE announced that new schools could be built more cost effectively based on new cost and floorspace standards⁷. Whilst extending an existing school can be cost effective, such projects can be disruptive and there are sometimes disproportionate costs.

Two of these options are considered in more detail in Section 5.

5 Accommodating the Level of High School Places Required from Growth Being Promoted Which Affects Wymondham and Hethersett High Schools

5.1 For the purposes of this report the following levels of growth currently being proposed by South Norfolk Council are understood to be relevant:

- From development contained in the JCS, within the catchment area of Wymondham High School. 2,200 dwellings.
- In Hethersett 1,200 dwellings (1,000 as contained in the JCS plus an additional 200) plus growth in Cringleford 1,200 (as per JCS) plus additional growth at Mulbarton circa 200

⁵ 11-19 Norfolk Education and Training Needs Analysis , Autumn Term 2011

⁶ Greater Norwich Infrastructure Need and Funding Study, EDAW, October 2009 (page 78)

⁷ <http://www.education.gov.uk/inthenews/inthenews/a00214951/new-school-designs>

(some 180 in excess of the JCS). All of the foregoing being within the catchment area of Hethersett High School - a total of 2,600 dwellings.

5.2 In addition, you are proposing further development in Wymondham amounting to 1,600 dwellings.

5.3 On the basis of growth totalling 6,400 dwellings (2,200 plus 2,600 plus 1,600), using the County's established pupil yield factors, we estimate the level of demand for high school places will be as follows:

Years 7 to 11	896 pupils
Years 12 to 13	179 pupils
Total	1,075 pupils

A New Sixth Form Campus

5.4 From our investigations we are of the view that growth provision of 3,800 dwellings in Wymondham can be accommodated as summarised below. Further details of the pupil numbers are provided in Appendix 1.

- Wymondham High School providing capacity for approximately 1,740 pupils in years 7-11 within existing and improved facilities
- A New Wymondham High School Sixth Form Campus, located on a freestanding site with capacity for 600 students. This new facility will accommodate existing Wymondham High School Sixth Form students, Wymondham Growth Sixth Form students and Hethersett catchment Growth Sixth Form students.
- The capacity of Hethersett High School capacity would be increased to accommodate approximately 1,110 year 7-11 pupils, much as currently envisaged.

5.5 As already indicated in paragraph 4.7, this is not the only possibility for providing extra capacity but it has the advantage that it enables the continued development of the Wymondham High School and would build on its good reputation whilst also relieving pressure on the existing school site.

A New High School

5.6 The existing masterplan for Wymondham High is intended to add some 630 places to the existing Net Capacity of 1,410 places in order to accommodate growth from 2,200 dwellings, and to address the existing capacity shortfall. As there is a substantial (200 place) capacity shortfall at present it appears very unlikely the current first phase of building work will even address the full extent of the existing shortfall.

5.7 900 places is the County's stated minimum size for an urban secondary school. The County identifies the need for a new secondary school as being potentially triggered by 5,000 to 6,000 dwellings⁸. In this case, a new school could be seen as providing for the 3,800 dwellings at Wymondham (approximately 640 pupils) together with part of the existing capacity shortfall at Wymondham High School and/or an alternative to part of the provision for 2,600 dwellings currently being envisaged as met by the expansion of Hethersett High School.

5.8 Overall, it is likely that a school for at least 900 pupils could be supported. A new school approach was noted as a possibility in the Infrastructure Need and Funding Study undertaken by EDAW in October 2009. At that time the County's Children's Services' response envisaged Hethersett might be a location for a new high school⁹.

5.9 The County's thinking on the appropriate minimum size for an urban secondary school is a traditional view, based on efficiencies of scale and organisation. It is interesting to note that the Free Schools initiative has made it clear that there is scope for a diversity of schools of different sizes and age ranges; and approval has been given for substantially smaller secondary schools than 900 places. One possibility would be to create an all through (primary and secondary) school. Over twenty mainstream all-through schools are open or proposed to be opened through the free schools program.

⁸ Norfolk County Council Planning Obligations Standards, March 2012

⁹ Greater Norwich Infrastructure Need and Funding Study, EDAW, October 2009 (pages 80 and 81)

6 Conclusions

6.1 The County has a statutory duty to ensure a sufficiency of school places, which we have seen no evidence to suggest it is saying it cannot meet. It is inappropriate to suggest it is the County's role to support, or oppose, a particular amount of housing development.

6.2 There is clear evidence that the County envisages demand from 2,200 dwellings in Wymondham can be met in a particular way. However, we have found no evidence that an alternative number of dwellings has been given serious consideration.

6.3 Information about current school rolls and capacities in this part of Norfolk indicate the need to provide additional capacity to meet needs arising from the existing population and from new housing in the future. Wymondham High currently has about 200 more pupils on roll than its capacity indicates.

6.4 There is no evidence that the County could not fulfil its statutory duty in the event that more than 2,200 dwellings were allocated to Wymondham.

6.5 The assertion that 2,200 dwellings should be seen as a maximum figure due to a limitation on the potential to expand Wymondham High is misguided, for a number of reasons including that 2,200 dwellings by 2026 is simply a particular point in time.

6.6 Even if the County's figures (the details of which have not been published for examination) prove correct, and it is not possible to expand Wymondham High beyond the capacity envisaged in (unpublished) masterplan for development of the school, there are other ways of adding additional high school capacity to the area.

Current County Strategy and Alternative Strategy with New Sixth Form Campus

1. The County's current strategy is understood to be as follows:

Pupil/Student Age Groups	Wymondham High	Hethersett High
Existing 11-16 pupils	1199	743
Existing sixth form pupils	406	0
Total	1605	743
From New Housing, <i> dwellings in catchment</i>		
	2200	2400
11-16 pupils	308	336
Sixth form pupils	62	< 67
Total in Schools, assuming no change to existing pupil numbers		
11-16 pupils	1507	1079
Sixth form pupils (416+62+56)	535	0
Total	2042	1079
Existing total capacity		
	1410	810
Additional capacity envisaged (* figure assumed)		
	630	270*
Future total capacity		
	2040	1080

2. An alternative approach, allowing additional housing, could be:

Pupil/Student Age Groups	Wymondham High 11-16 Campus	Wymondham High Sixth Form Campus	Hethersett High
Existing 11-16 pupils	1199		743
Existing sixth form pupils	406 >		0
Total	1605		743
From New Housing, <i> dwellings in catchment</i>			
	3800		2600
11-16 pupils	532		364
Sixth form pupils	106 >		< 73
Total in schools, assuming no change to existing pupil numbers			
11-16 pupils	1731		1107
Sixth form pupils	>	585	<
Total (# total 2323 on two campuses)	1731 [#]	585 [#]	1107
Existing total capacity			
	1410		810
Additional capacity envisaged (* figure assumed)			
	330	585	300*
Future total capacity			
	1740	600	1110

Notes: (1) Source data - Existing pupil data: NCC website; Capacity data: DfE Edubase.

(2) The alternative approach allows for an additional 1,600 dwellings at Wymondham and an additional 200 dwellings at Mulbarton – neither of these were considered in the County's January 2013 Overview and Scrutiny Panel Report.



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PRACTICE BRIEFING NOTE

SCHOOL PLACE PLANNING

E^{FM} was formed in April 1990 and since 1992 has provided guidance to schools on dealing with Local Education Authorities and Central Government. This has included all of the areas impacting on school place provision.

Since 1996 E^{FM} has worked for an increasing number of house-builders and their advisers. This in recognition of E^{FM}'s proven skills in negotiations with Education Authorities and the subsequent agreement of reasonable Section 106 agreements with Local Planning Authorities, and the preparation and presentation of evidence to Inquiries.

E^{FM} is a school places planner to Land Securities, St George Plc, Countryside, Taylor Wimpey, Barratt, Persimmon Homes, Martin Grant Homes, Heron, Miller Homes, Berkeley Homes, David Wilson Homes, KingOak, Redrow, NHS Estates, Wilcon Homes, Countryside, Bovis Wates, Crest Nicholson, Redrow, St Modwen, Bellway, Twigden, O&H, Linden, Fox Land, Gallagher, Fox Land, and others.

E^{FM} works with Planning Consultants. Introductions to developers are facilitated through professional relationships with Robert Doughty, Broadway Malyan Planning, Robert Turley Associates, Barton Willmore Planning, Andrew Martin Associates, Fenn Wright, Evison, Montagu Evans, Pegasus Planning Group, RPS and others.

For small and medium size developments, the strategy centres on building a positive and constructive relationship with LEA strategists. They are under equal pressure to secure sufficient school places and avoid creating surplus places.

For large developments, E^{FM} has developed methodologies with its demographers for generating population models that can forecast demand for school places arising from development. These can be sensitive to time, migration rates, housing trends and other impacting effects to show how these vary over time.

E^{FM}'s School Place Planning Team is led by Company Principal, Steve Clyne, and former Hertfordshire Planning Obligations Manager, Jan Kinsman.

E^{FM}'s work with schools, colleges, PFI establishments and other properties is under the direction of Sarah Wood. Steve Clyne retains a strategic role both as space planner and project manager: delivering a 1,000-place secondary school in Hillingdon. Consequently E^{FM} has close working relationships with experienced specialist professionals and can recommend practices for tender lists when practical solutions are needed - for example, how a school might be remodelled for expansion.

Extract of STA4

Greater Norwich Development Partnership

Joint Core Strategy for
Broadland, Norwich and South
Norfolk

Technical Consultation Regulation 25

August 2008

Jobs, homes, prosperity for local people



NORWICH
City Council



Norfolk County Council



Broads Authority
The Broads - a member of the
National Park family

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1. Executive Summary

- 1.1 For the past year the three councils of Broadland, Norwich and South Norfolk have been working together with Norfolk County Council as the Greater Norwich Development Partnership (GNDP) to develop long term plans for housing growth and jobs in the area.
- 1.2 This report sets out proposals for potential inclusion in a plan – called the ‘Joint Core Strategy’ – that will guide future housing growth in Norwich and the surrounding area. This is motivated by a need to contribute to national house building targets in a sustainable way.
- 1.3 The target for growth is to identify sites for at least 47,500 new homes in the area between 2001 and 2026. Significant progress has already been made, with 7,500 homes already built, and planning permission granted for a further 14,700 (as at April 2006). This means that locations for a further 25,400 home still have to be identified. This report sets out in detail the proposals for doing this, alongside a full appraisal of the infrastructure developments that will be needed to support the new homes. The target for growth in employment is to provide 35000 new jobs between 2001 and 2021. An employment growth study has been carried out to identify and update the opportunities and interventions required to encourage job growth.

Background

- 1.4 In November 2007, Broadland, Norwich and South Norfolk district councils, together with Norfolk County Council, carried out a 12 week ‘issues and options’ consultation among residents.
- 1.5 In addition, a number of Evidence Studies have been undertaken and these determine the major infrastructure and sustainability needs facing the area over the planned growth period.
- 1.6 A number of proposals for growth are detailed in this document. These have been drawn up after reviewing all the responses to the consultation and the results of the Evidence Studies. The Partnership believes these represent viable solutions for the area to meet its 2026 growth targets, as well as ensuring the infrastructure is in place to accommodate development beyond this.
- 1.7 These proposals are explained in detail throughout this document. The Partnership invites all organisations being consulted to examine these and respond.

Vision

- 1.8 This document includes the vision for the area. The overarching aim is to build sustainable communities across three districts. The key elements to this include:
 - The opportunity to play an active part in community life and be involved in decision making
 - Healthier and safer places and a high quality environment
 - Access to suitable housing, jobs, facilities and services
 - Opportunities for people to learn at all stages of life
 - The right infrastructure so people can travel using varied forms of transport.

1.9 A significant element in achieving this will be about getting the locations for new growth right.

Proposed new housing locations

1.10 To deliver the planned housing growth large scale development concentrated in particular locations and a mixture of small scale development, dispersed around the area, is proposed.

1.11 The Partnership is currently examining three potential options for large scale development. Each of these options offers the potential for 24,000 new homes, which will be supported by a range of new infrastructure investments, including employment sites, new schools, transport links and health services.

Potential options for major development

Location	Option 1	Option 2	Option 3
Norwich	4,000 new homes	4,000 new homes	4,000 new homes
Broadland	2,000 new homes	2,000 new homes	3,000 new homes
South Norfolk	2,000 new homes	2,000 new homes	2,000 new homes
Sprowston and Rackheath area	6,000 new homes	6,000 new homes	6,000 new homes
Hethersett and Little Melton area	4,000 new homes	4,000 new homes	No significant development
Mangreen, Swardeston, Mulbarton, and Swainsthorpe area	No significant development	No significant development	4,500 new homes
Wymondham	4,000 new homes	2,000 new homes	2,000 new homes
Costessey and Easton area	2,000 new homes	2,000 new homes	1,000 new homes
Long Stratton	No development	2,000 new homes	1,500 new homes

Sites identified for small scale development

300 new homes: - Diss 200-300 new homes: - Harleston	100-200 new homes: - Acle - Reepham - Wroxham - Loddon	Around 100 new homes: - Hingham	20-50 new homes: - Blofield - Brundall - Hethersett* - Long Stratton*
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* unless chosen as a major growth location as shown above.

1.12 This document contains further detail on the options, and what the main objectives are.

Policy 5 Locations for major change and development in the Norwich Policy Area

All growth locations will be masterplanned using accredited design methodology to achieve the highest possible standards of design and to:

- deliver healthy, sustainable communities and locally distinctive design
- achieve a high level of self containment while integrating well with neighbouring communities
- be designed around walking and cycling for local journeys and public transport for longer journeys
- include SUDS, on site or nearby energy generation, for example CHPC, and water saving technologies
- include new primary schools, local retail and other services, small scale employment opportunities and primary healthcare facilities
- ensure high quality telecommunications and adequate energy supply and sewerage infrastructure

Note: The Issues and Options consultation invited comments on specific locations for major growth. Although there was no significantly different public preference between places, a number of places for larger scale growth have been considered for further investigation. One combination of places is supported by evidence studies and early work on sustainability, while the two others are based on responses to the earlier consultation exercise (including a separate consultation on the support for a bypass for Long Stratton) and have been developed to add a Long Stratton bypass, and seeking to make fuller use of the A140 corridor. Differences in performance, sustainability and synergies of infrastructure provision require further evaluation.

The Greater Norwich Development Partnership has not yet decided how major growth can best be provided in the NPA. The broad locations for this major growth and the number of new homes in each place are summarised in the table below. Appendices 1, 2 and 3 describe these options in more detail.

Location	Option 1	Option 2	Option 3
Norwich	4,000	4,000	4,000
Broadland smaller sites	2,000	2,000	3,000
South Norfolk smaller sites	2,000	2,000	2,000
North East (Sprowston/Rackheath area)	6,000	6,000	6,000
South West (Hethersett/Little Melton area)	4,000	4,000	
South (Mangreen/Swardeston/Mulbarton /Swainthorpe area)			4,500
Wymondham	4,000	2,000	2,000
West (Costessey/Easton area)	2,000	2,000	1,000
Long Stratton		2,000	1,500
TOTAL	24,000	24,000	24,000

Appendix one – option one

Major growth at Wymondham and Hethersett on the A11 corridor and to the North East of Norwich inside and outside the Northern Norwich Distributor Road

Key Dependencies

To implement the option significant highway improvements are required at the Longwater (A1074), Watton Road (B1108) and Thickthorn (A11) junctions on the A47 Norwich Southern Bypass) together with provision of the NNDR which will also improve Postwick junction.

The primary public transport route from the south west will be along Newmarket road. In addition bus priority measures are needed along Hethersett lane crossing the A47 and linking with the Norwich Research Park, Hospital and University, supported by expansion of the existing Thickthorn Park and Ride site with improved access from A11 northbound. The growth in the north east will require the promotion of at least one bus priority route into the city centre which may be Gurney Road / Salhouse Road.

There will need to be improvements to the walking and cycling networks and more localised road and bus priority improvements, but these will depend on the form of development in the growth areas and the continued work on the Norwich Area Transportation Strategy.

New secondary schools are needed to serve the new communities in the north east, south west and Wymondham. The educational requirements of the remaining growth will be met by enhancing existing facilities. New primary schools would be provided within the housing developments.

Additional infrastructure will need to be provided to overcome the constraint on electricity supply to the Longwater area.

Description of major growth locations

North East Sector (Sprowston / Rackheath area)

This location will deliver an urban extension extending either side of the NNDR. Delivery is dependent on the implementation of the NNDR. The structure of the local geography suggests that this new community will take the form of a series of inter-related new villages or quarters and will include:

- at least 6,000 dwellings (rising to a total of at least 10,000 dwellings after 2026)
- a district centre based around an accessible “high street” and including a new library, education and health facilities. The development will also require new local centres.
- a new secondary school with an initial phase to open within the first 5 years. To facilitate early provision the early phases of development will concentrate on family housing.

- Retention of existing important greenspaces and significant levels of heathland re-creation to provide stepping stones to link Mousehold Heath to the surrounding countryside. Historic parkland will be conserved.
- bus rapid transit to the city centre possibly via Salhouse Road and Gurney Road and a choice of safe and direct cycle routes to the centre.
- safe and direct cycle and pedestrian routes, and orbital bus services, to Broadland Business Park, Rackheath employment area, Airport employment areas
- a new rail halt at Rackheath
- permeability and community integration across the NNDR and with existing communities.

South West Sector (Hethersett/Little Melton area)

This location will deliver a new country town providing

- at least 4,000 dwellings (rising to a total of at least 7,000 dwellings after 2026)
- a town centre based around an accessible “high street” designed to serve the new community and the immediate locality and not to draw trade from a wider area. The town centre will include retail, service and employment provision, a new library, healthcare and education facilities. The development will also require new local centres and be complemented by enhanced facilities in the existing villages.
- a new secondary school with an initial phase to open within the first five years (possibly delivered through the relocation and expansion of Hethersett High School)
- a new small scale business park closely integrated with the town
- extensive levels of green infrastructure to create a “Ketts Country” pastoral landscape of grass, wood, hedgerow and wetland habitat. This will include a new country park and significant landscape buffers to provide a setting for the town and to maintain important strategic gaps and the settings of Norwich and Wymondham
- SUDS – the underlying geology suggests this will also provide wetland habitat
- bus rapid transit to the city centre possibly via Newmarket Road
- safe and direct cycle routes and local bus services to NRP, Wymondham and Longwater

Wymondham

This location will deliver expansion of the urban area to include

- at least 4,000 dwellings (rising to a total of at least 5,000 after 2026) located predominantly to the south and east of the town to ensure best access to the town centre and railway station and to maintain the strategic gap to the north and northeast
- expansion of the town centre of a quality that will retain and enhance the distinctive character of the existing historic centre
- a new secondary school with an initial phase to open within the first 5 years. To facilitate early provision the early phases of development will concentrate on family housing
- extensive levels of green infrastructure to create a “Ketts Country” pastoral landscape of grass, wood, hedgerow and wetland habitat. This will also strengthen the importance and role of the Tiffey valley, the landscape setting of the town and strategic gaps, particularly towards Hethersett
- bus rapid transit to the city centre and exploiting any opportunities to maximise the use of rail connections

- safe and direct cycle and pedestrian routes to key locations in and around Wymondham including the town centre, the railway station and Gateway 11, and enhanced longer distance cycle access to Hethel, Hethersett and NRP

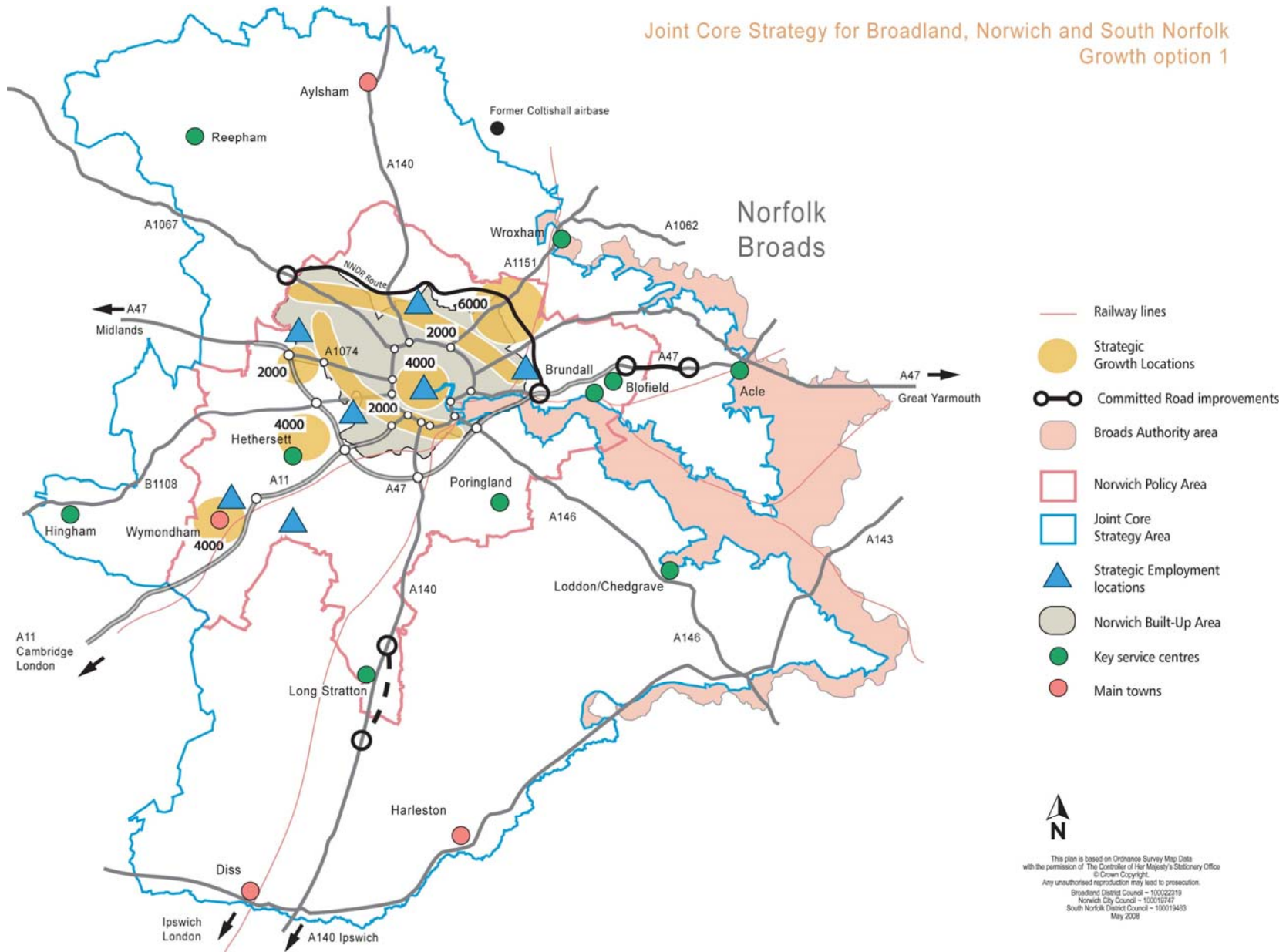
West

This location is dependent on capacity expansion of the A47 Longwater junction and will provide

- around 2,000 dwellings at Costessey and Easton
- a new local centre at Easton
- secondary school provision will be provided by a combination of schools in the area at Costessey, Earlham and new provision at SW growth location. Additional opportunities may be also provided at Easton College
- Green Infrastructure to provide enhanced public access to the Yare valley including Bawburgh lakes
- bus rapid transit to the City Centre via Dereham Road
- bus and cycle links NRP and to secondary schools (including SW growth location)
- safe and direct cycle and pedestrian access to Longwater employment and retail area and the Bowthorpe employment area

(NB additional dwellings total to 24,000 i.e. 1,000 more than required to provide for contingency and flexibility. Further contingency and flexibility will be provided by efforts to encourage further brownfield opportunities and bringing forward larger sites more quickly. The strategy also identifies 8,000 dwellings (4.4 years supply) in large new communities for the post 2026 period).

Joint Core Strategy for Broadland, Norwich and South Norfolk
Growth option 1



Extract of EiP 96

Greater Norwich Development Partnership Policy Group

Minutes of a meeting of the **Greater Norwich Development Partnership Policy Group**, held at County Hall, Martineau Lane, Norwich on **Friday 18 July 2008 at 2pm** when there were present:

Cllr Steve Morpew – Chairman

	Representing
Cllr Stuart Clancy	Broadland District Council
Cllr Brian Iles	Broadland District Council
Cllr Andrew Proctor	Broadland District Council
Cllr Simon Woodbridge	Broadland District Council
Cllr Derek Blake	South Norfolk Council
Cllr Colin Gould	South Norfolk Council
Cllr John Fuller	South Norfolk Council
Cllr Martin Wynne	South Norfolk Council
Cllr Eve Collishaw	Norfolk County Council
Cllr Daniel Cox	Norfolk County Council
Cllr Christopher How	Norfolk County Council
Mr Alan Mallett	Broads Authority
Sandra Eastaugh – Officer	GND Partnership Manager
Graham Nelson – Officer	Norwich City Council
Paul Rao – Officer	Norwich City Council
Phil Kirby – Officer	Broadland District Council
Roger Burroughs – Officer	Broadland District Council
Ken Barnes – Officer	South Norfolk Council
Mike Jackson – Officer	Norfolk County Council
Phil Morris - Officer	Norfolk County Council
Mary Marston	Government Office – East of England
Chris Starkie	Shaping Norfolk's Future

1 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Brenda Arthur, Brian Morrey and Alan Waters (Norwich City Council) and Adrian Gunson (Norfolk County Council).

2 MINUTES

The minutes of the meeting held on 24 June 2008 were confirmed as a correct record.

3 JOINT CORE STRATEGY

Phil Kirby presented the report and explained that the purpose of today's meeting was to seek agreement to the content of the options consultation

A G E N D A

Page No

18 December 2008
Mancroft Room at City Hall
Lunch at 12.30
Meeting starts at 1.00pm

- 1 To receive declarations of interest under Procedural Rule no 8**
- 2 Apologies for absence**
- 3 Minutes of meeting held on 9th October 2008**
- 4 Matters arising there from (if any)**
- 5 Joint Core Strategy**
 - **Summary report on regulation 25 consultation**
 - **Risk**
 - **PINS proposal**
 - **Way forward**
- 6 Growth Point Funding Announcement and future programme of projects**
- 7 RSS review**
- 8 Summary of current projects and budget statement**
- 9 Homes and Communities Agency and new arrangements**
- 10 Future meeting dates**
 - Thursday 19 March 2009 (2.00pm - 4.00pm)**
 - Thursday 25 June 2009 (2.00pm - 4.00pm)**
 - Thursday 24 September 2009 (2.00pm - 4.00pm)**
 - Thursday 17 December 2009 (2.00pm - 4.00pm)**

1. Report structure

1.1 This report highlights the information and evidence that has come forward from a wide range of sources including the recent Regulation 25 consultation. Summaries of the additional evidence gathered are contained in the appendices to this report.

Housing context

1.2 There are significant similarities between the three options. Consequently, many of the advantages and disadvantages outlined below are common across them.

1.3 The following section looks at the 3 options as presented in the Regulation 25 consultation:

Location	Option 1 (after 2026)	Option 2 (after 2026)	Option 3 (after 2026)
Norwich	4,000	4,000	4,000
Broadland smaller sites	2,000	2,000	3,000
South Norfolk smaller sites	2,000	2,000	2,000
North East (Sprowston/Rackheath area)	6,000 (+4000)	6,000 (+4000)	6,000 (+4000)
South West (Hethersett/Little Melton area)	4,000 (+3000)	4,000 (+3000)	
South (Mangreen/Swardeston/ Mulbarton /Swainthorpe area)			4,500
Wymondham	4,000 (+1000)	2,000	2,000
West (Costessey/Easton area)	2,000	2,000	1,000
Long Stratton		2,000	1,500
TOTAL	24,000 (+8000)	24,000 (+7000)	24,000 (+4000)

Employment context

1.4 The Greater Norwich Employment Growth and Employment Sites and Premises Study undertaken by Arup, indicates that the total requirement for employment land across the Greater Norwich Development Partnership area in the period 2007 to 2026 ranges from about 230 hectares to 250 hectares. The lower requirement is derived from economic forecasts constrained to the number of planned new dwellings while the upper level is unconstrained by dwellings provision.

1.5 Recommended levels of new office provision in the City Centre accounts for the equivalent of about 10 hectares of this land requirement. Consequently, the maximum level of land allocation required outside the City Centre is around 240 hectares.

2. Analysis of Norwich Policy Area growth options

Option 1

Norwich	4000
Broadland Fringe	2000
South Norfolk Fringe	2000
North East	6000 (+4000)
South West	4000 (+3000)
Wymondham	4000 (+1000)
West	2000

Note: As much new development as possible should be located in the City of Norwich as it is a highly sustainable location. Development in the city must have regard to the mix of uses that benefit from a city centre location such as offices or shopping. Work has been carried out and is continuing to assess the capacity of the city (and especially the city centre) for new development. At present there is a high degree of confidence about these long-term estimates for housing capacity and this will be refined through regular development monitoring and viability assessment of new sites.

In Broadland the focus of development is in the north east sector. This builds on work undertaken at the Issues and Options stage of the joint core strategy and the early preparation of a core strategy for Broadland alone. Locations for growth to the north east of Norwich are supported by the evidence gathered to date.

Therefore these elements are common to all the options and the remainder of this assessment focuses on the areas where the options differ.

Advantages and disadvantages of Option 1

2.1 Advantages

- The south west is currently the best performing public transport corridor with good links directly to priority measures within the city centre
- High quality public transport can be achieved with minimum impact elsewhere utilising existing bus priorities
- Wymondham has an existing rail station with services to Norwich, Cambridge and Peterborough
- Locations are close to and have good access to a choice of the established and proposed strategic employment growth locations.
- One of the submissions points to the ability to deliver a country park in the south west
- Focussing growth on the A11 corridor allows significant sharing of infrastructure costs
- Allows for continuity of growth after 2026

2.2 Disadvantages

- Growth on the A11 corridor is reliant on achieving significant improvements to the Thickthorn junction

- Long term growth at Wymondham would require expansion of the sewage treatment works by 2026, sooner if other flows are directed there
- This option does not offer direct developer funding towards the Long Stratton Bypass
- Potential impact on historic Wymondham

2.3 Costs of Option 1

The early work on comparative costs is in the High Level Implementation Plan (appendix c). The cost is estimated at £606m.

Risks of Option 1

2.4 Significant risks across all options

- Inability to deal with waste water – regulatory issues and overcoming constraints at Whitlingham
- Failure to secure water supply (transfers and pipes)
- Failure to deliver Norwich Area Transportation Strategy
 - Norwich Northern Distributor Road
 - Postwick junction
 - Remainder of Norwich Northern Distributor Road
 - Major public transport improvements
- Inability to provide electricity supply at Longwater - constraint to delivering employment
- Failure to deliver Longwater southern bypass junction
- Low land values and the collapse of the housing market impacts on delivery and infrastructure contributions
- Level-crossings in the North-East sector may be cause for concern

2.5 Additional risks

- Failure to provide significant improvements to the Thickthorn junction

Significant points from Regulation 25 consultation

2.6 North East Sector

- Confirms eventual potential for in excess of 10,000 dwellings
- Significant interest from landowners across the area but limited evidence of co-ordination and absence of worked-up illustrative proposals challenges delivery. Further information to address these concerns has been sought.
- Rackheath eco-community proposal is more advanced and has the potential for early delivery

2.7 Hethersett/Lt Melton and Colney/Cringleford fringe

- Three separate but adjoining proposals totalling in excess of 700 hectares allows significant scope to shape a deliverable solution
- Developer-led proposals and limited ownerships reduces risks to delivery
- Areas proposed capable of delivering significantly in excess of the 4000 - 7000 dwellings considered
- Large scale green infrastructure, including up to 160 hectares of country parks proposed.

- Expanded Park & Ride with direct access from the A11 and other transport solutions proposed.

2.8 Wymondham

- A range of proposals allows significant scope to shape a deliverable solution
- Developer-led proposals reduces risks to delivery
- Concerns about the potential impact on the historic environment could affect the scale of growth that might be appropriate
- Concerns about education provision and the need for new sewerage capacity are more likely to be overcome efficiently with large scale growth

2.9 Easton/Costessey

- Proposals at both Easton and Costessey capable of providing around 2000 dwellings in total
- Easton proposals provides local community benefits and improvements to a key educational establishment (Easton College)

RESOLVED to invite the Chief Executive of the Homes and Communities Agency to a future meeting.

8. DATES OF FUTURE MEETINGS

RESOLVED to:-

- (1) hold the next meeting to endorse the planning authorities endorsement of the favoured Option (2A) and consider the outcome of the Planning Inspectorate pre-submission review on Thursday, 19 February 2009 at 1.00 p.m.;

- (2) note the dates of future meetings as follows:-
 - Thursday, 19 March 2009 at 2.00 p.m.
 - Thursday, 25 June 2009 at 2.00 p.m.
 - Thursday, 24 September 2009 at 2.00 p.m.
 - Thursday, 17 December 2009 at 2.00 p.m.

9. ANY OTHER BUSINESS

Mark Fuller circulated a draft press release and in the light of the discussions revisions were suggested and agreed by Partners.

RESOLVED to note the agreed press release (which is attached to these minutes at Appendix C).

CHAIR

Greater Norwich Development Partnership Policy Group

Minutes of a meeting of the **Greater Norwich Development Partnership Policy Group**, held at City Hall, St Peter's Street, Norwich on **Thursday, 18 December 2008 at 1.00 p.m.** when there were present:

Councillor Steve Morpew – Chairman

Councillor Andrew Proctor
Councillor Roger Foulger
Councillor Simon Woodbridge
Councillor Brenda Arthur
Councillor Brian Morrey
Councillor Alan Waters
Councillor Adrian Gunson
Councillor Brian Iles
Councillor Derek Blake
Councillor John Fuller
Councillor Martin Wynne
Councillor Colin Gould
Mr Alan Mallett

Representing:-

Broadland District Council
Broadland District Council
Broadland District Council
Norwich City Council
Norwich City Council
Norwich City Council
Norfolk County Council
Norfolk County Council
South Norfolk Council
South Norfolk Council
South Norfolk Council
South Norfolk Council
The Broads Authority

Phil Kirby
Roger Broughs
Sandra Eastaugh
Jerry Massey
Graham Nelson
Paul Rao
Andrew Gregory
Tim Horspole
Mike Jackson
Phil Morris
Mary Marston
Mark Fuller

Broadland District Council
Broadland District Council
GND Partnership Manager
Norwich City Council
Norwich City Council
Norwich City Council
South Norfolk Council
South Norfolk Council
Norfolk County Council
Norfolk County Council
Go-East
Linstock Communications

1 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Stuart Clancy (Broadland District Council); and Councillors Daniel Cox and Eve Collishaw (Norfolk County Council).

2 MINUTES

The minutes of the meeting held on 9 October 2008 were confirmed as a correct record.

3 JOINT CORE STRATEGY

(An amendment to the Table on page 39 of the agenda was circulated at the meeting which shows the Broadland NPA allocations increased to 9,000 (from 8,000) and a new rural allocation of 1,611).

Phil Kirby presented the report and explained that the purpose of this meeting was to agree a single strategy for the spatial distribution of housing growth across the Partnership area; consider the offer from the Planning Inspectorate to undertake a pre-submission review and decide whether to accept or decline the offer; and agree the next steps in the light of the decisions taken on the previous matters. Members were advised that there was a clear preference in favour of Option 1 arising from the evidence submitted. Members would need to form their own opinion based on the evidence received to date, and that emerging from the further activity that has been ongoing over the past few months, with technical bodies, development interests, and local communities.

Members were advised of the key risks of failure to agree a 'favoured' option for the Joint Core Strategy as set out in item 5C, pages 121-122 of the agenda. Members also noted that further responses received after the consultation period had been received in respect of Broadland and South Norfolk districts and these had been logged by the GNDP and responses forwarded to each local planning authority as part of the evidence base. (The paper which was circulated at the meeting is attached to the minutes at Appendix A.)

Councillor Fuller, on behalf of South Norfolk Council, then presented a proposal for a hybrid version of Options 2 and 3, Option 2A, which proposed a further new settlement at Mangreen and more balanced development along the A140. This proposal would be more acceptable than Option 1 for the residents of South Norfolk. (A copy of the proposal and wording was circulated at the meeting and is attached to these minutes at Appendix B.)

Phil Kirby said that there had been some advance notice of the proposed Option 2A and that at the request of the Chair a response had been prepared. As with Options 1, 2 and 3, as summarised in the report, this new option had advantages and disadvantages, many of which were consistent to all options, and highlighted those that were particularly relevant to this case:-

'In respect of the advantages:

- The level of proposed growth at Long Stratton had the potential to deliver the bypass, which would be of benefit to the local community;
- A limited level of growth at Wymondham and Hethersett would have limited local impact, better respecting the existing character of these two settlements, and minimising the prospect of the settlements coalescing along the A11 corridor;

- By avoiding concentration of development in the south-west, and reliance therefore upon the A11, the dependency upon major improvements to Thickethorne junction is reduced;
- A development of the scale proposed at Mangreen, would help deliver continuity in terms of residential land supply, and provided an opportunity for an exemplar new community to the south of the city, mirroring the opportunity presented by Rackheath to the north;
- Public transport improvements might be able to be achieved from Mangreen into the City, with the potential to utilise the existing railway line at some point in the future; and
- Including Mangreen as an additional allocation adds robustness and flexibility to the strategy.

In respect of the disadvantages:

- This offered a more dispersed pattern of growth than that preferred to Broadland, which made the delivery of infrastructure more challenging and arguably less efficient;
- Splitting growth between the A11 and A140 corridors was likely to require significant improvements to both junctions with the A47, potentially doubling the cost and although a new railway station at Mangreen was feasible, it was not yet known whether it would be viable, so it cannot be relied upon at this stage in the process;
- The full environmental and traffic impacts of public transport improvements to the A140 corridor have yet to be fully identified and were likely to be challenging;
- Delivery of a rapid bus transport service along the A11 corridor is less likely due to lower levels of growth;
- Education solutions were not readily identifiable - the low level of growth at Wymondham was insufficient to support a new high school, the existing high school is already at capacity; Hethersett, Colney, Cringleford, Mulbarton/Swardeston sit within the Hethersett catchment and Hethersett High School was close to capacity;
- Whilst the eventual size of Mangreen would support a new high school there, unless it was delivered early, pressure would increase on Hethersett and surrounding schools requiring additional investment that would be superseded by the provision of a new school at Mangreen.

In summary, whilst the spatial distribution proposed in Option 2A had the potential to better fit the existing settlement character and pattern of South Norfolk, it did present some significant challenges that would need to be pursued, if this option was to be taken forward.'

Considerable discussion took place on the implications of Option 2A and concerns and although representatives from Broadland District and Norwich City Council were broadly in favour there was concern about the increased costs for the provision of infrastructure; the soundness of the proposal and the effect that it might have on residents within the Broadland District and City

Greater Norwich Development Partnership Policy Group

Council areas. Mike Jackson pointed out that if the Long Stratton bypass was not fully funded it would impact on infrastructure and services elsewhere. Councillor Gunson supported improvements to the A140 and concurred with Councillor Fuller's assertion that it was an important route for Norfolk and concentration should not just be on improvements to the A11. Tim Horspole suggested that a solution for high school places at Wymondham would be to provide a Sixth Form centre on a separate site, therefore freeing up capacity on the main High School site. Phil Kirby then reported the increased costs for Option 2A taken in conjunction with the table on page 41 (which is reproduced below) which included the anticipated growth capacity of defined settlements beyond 2026 and it was noted that this was an increase in the infrastructure cost of £100m.

Option	Infrastructure cost (£M)	Final Dwelling Numbers (post 2026)	Cost per dwelling (£)
1	605.6	32,000	18,900
2	621.6	31,000	20,000
3	623.8	28,000	22,200
2A	706m	30,700	23,000

Discussion then ensued on the offer from the Planning Inspectorate (PI) for a pre-submission review. Phil Kirby said that if this offer was taken up the review would take place on 27 January 2009. Although this pre-submission review could take place at the same time as the consultation it would be useful to have the benefit of the Inspector's comments for the sake of delaying by a few days. The City Council's Executive could not endorse the recommendations of the Policy Group until its meeting on 21 January 2009 to allow its LDF Working Party an opportunity to consider the proposal. Mary Marston suggested that it would be prudent for the Partnership to take account of feedback from the PI when going out for consultation. The review would identify any potential weaknesses in the strategy. Following the PI review and the endorsement of the planning authorities there would be a further meeting of the Policy Group.

RESOLVED to:-

- (1) note the late representations submitted on the Joint Core Strategy following the close of the consultation period;
- (2) note the risks identified in paper 5C;
- (3) agree Option 2A (as circulated at the meeting and attached to these minutes at Appendix B) as the single favoured option to go forward, noting the reservations and concerns expressed at the meeting. This is subject to:
 - (a) the endorsement of constituent planning authorities;
 - (b) the results of the Planning Inspectorate review giving confidence about the evidence base; and

- (c) a further meeting of the GNDP policy group following the review to endorse. (The meeting was subsequently provisionally agreed to be held on Thursday 19 February 2009 at 1.00 p.m.]

4 GROWTH POINT FUNDING ANNOUNCEMENT AND FUTURE PROGRAMME OF PROJECTS

Sandra Eastaugh presented the report on the allocation of funding from the Communities and Local Government Office (CLG). The Chair pointed out that the 43% increase on the earlier indicative allocation amounted to £3.5m. Officers representing each Authority were meeting in mid-January to prepare a list of priority projects for Members to consider at their next meeting. Sandra Eastaugh suggested that proposals for allocations were brought back to this Group from each of the districts and the officers.

Initial indications from the districts included more funding for the implementation of Norwich Area Transport Strategy (NATS) from Norwich; a retail masterplan for Wymondham and Long Stratton from South Norfolk; and further work on the Deal Ground from Broadland.

RESOLVED to ask each of the districts to consider further allocations to bring back for consideration at the next meeting of the Policy Group.

5. EAST OF ENGLAND PLAN REGIONAL SPATIAL STRATEGY (RSS) REVIEW: RESPONSE BY THE GNDP

Phil Morris presented the report and circulated maps showing of Aylsham, Diss and Harleston (addressed in the report at paragraph 7.6) and an extract from the RSS showing Policy NR1 – Norwich Key Centre for Development and Change. In the Eastern Region, Peterborough, Cambridge and Norwich were the core cities of growth, with potential new towns being proposed.

During discussion reference was made to the fact that if in rural areas the overall provision of housing fell below the level required the deficit would be met within the same district and within the next tier down in the settlement hierarchy. This would mean that it would fall on the market towns or villages to fulfil the deficit without the necessary infrastructure being in place. Additional infrastructure should be part of the RSS and it was essential that it was in place. It was pointed out that planning provision should not stop in 2025/2026 but should be ongoing.

Discussion ensued in which members considered whether growth was being led by economic forces or the demand for housing. It was suggested that

there was more evidence that the need for housing was driving the growth agenda and that with the economic downturn there would be significant job losses. There was a need to stimulate the economy and create new jobs. It was pointed out that there was a relationship between housing and the economy and that one of the constraints on the economy was the lack of housing. Members considered that the current economic situation was vastly different from that of 2007. Chris Starkie advised members that the strategy needed to build the economy so that it could come out of the recession. The preparatory work needed to take into account that it was not so robust because of the current economic situation. Finance and banking were most affected however had not been seen as an area of growth. Norwich was not badly placed as insurance was pretty solid, and its high street banks were no more affected than any other British town centre.

RESOLVED to advise the County Council that subject to further work to understand the impact of the recession on the local economy and a commitment to fund infrastructure already required to implement the Greater Norwich Development Partnership's Joint Core Strategy to 2026 and a clearer commitment to fund the necessary additional infrastructure required to 2031, 12,000 dwellings is considered the absolute maximum level of additional growth for the area in the period to 2031.

6. SUMMARY OF CURRENT PROJECTS AND BUDGET STATEMENT

Sandra Eastaugh presented the report and answered questions. A revised version of the report was circulated at the meeting.

Mike Jackson suggested that the feasibility study into the need for a concert/conference centre should be considered at the next meeting. This would ensure that a number of interests were properly balanced. It was noted that St Andrew's and Blackfriar's Hall were assets of the City Council.

RESOLVED to note the report and that the feasibility study into the need for a concert/conference centre will be considered at the next meeting.

7. HOMES AND COMMUNITIES AGENCY AND NEW ARRANGEMENTS

Sandra Eastaugh reported that the Homes and Communities Agency was a new regeneration agency which brought together the delivery of housing and regeneration from English Partnerships, Housing Corporation, Academy for Sustainable Communities and key housing and regeneration programmes delivered by Communities and Local Government (CLG). Sir Bob Kerslake was the Chief Executive and Terry Fuller the Regional Director.