

Statement of Focussed Changes to Joint Core Strategy for
Broadland, Norwich and South Norfolk
Period for representations 19 July 2010 – 31 August 2010

Summary of representations

Document	Respondents		Representations		
	Total	Of which objecting	Total	Supports	Objects
Statement of Focussed Changes	194	189	557	18	539
SoFC Sustainability Appraisal	5	5	5		5
SoFC Affordable Housing Study	4	3	4	1	3
Total	195	190	566	19	547

Representations in full

The following pages detail the text of each representation in full. The representations, as submitted, can be viewed at www.gndp.org.uk

Statement of Focussed Changes (Joint Core Strategy)

O - 11743 - 8659 - FC1 Housing Delivery and supporting text - i, iii

11743 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: British National Party (Edith Crowther) [8659]

Agent: N/A

Full Text:

It will not be possible any longer to provide any housing that will be "affordable" at any price, due to A) the local, national and global economy being in crisis for the foreseeable future and B) the carbon dioxide and other pollution targets already set by the UK Government and the EU.

Housing is no longer affordable whether you are the Builder, the Investor, the Buyer, or the Vendor of an overpriced house. It is especially no longer affordable to the environment - the cost to clean air, plentiful water, wild flora and fauna, is far too great.

Summary:

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Housing is no longer affordable whether you are the Builder, the Investor, the Buyer, or the Vendor of an overpriced house. It is especially no longer affordable to the environment - the cost to clean air, plentiful water, wild flora and fauna, is far too great.

Statement of Focussed Changes (Joint Core Strategy)

O - 11820 - 8209 - FC1 Housing Delivery and supporting text - i, ii

11820 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Timewell [8209]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary: Timewell Properties Ltd object to the 'focussed change' to JCS Policy 4: Affordable Housing (FC1).

Timewell Properties Ltd consider that revised Policy 4's requirement for 40% of houses on sites of 16 dwellings or more to be affordable housing is, by the GNDP's own evidence, undeliverable in most instances without public subsidy and therefore potentially unsound.

The focussed change fails the "Justified" and "Effective" soundness tests because it is not based on robust and credible evidence and does not represent the most appropriate strategy when considered against the alternatives. The Focussed Changes could result in an undeliverable policy, particularly in the short to medium term and the likely limited supply of public subsidy during this period.

The Affordable Housing Viability Study, (DJD, July 2010) demonstrates that the 40% target is undeliverable in 60% of the tested viability scenarios, without public subsidy and marginal in 10% of tested scenarios.

Timewell Properties Ltd suggests that given the likely scarcity of public subsidy in the short to medium term, the affordable housing target should be set at a more realistic and achievable level. In other words set at a level that can be shown to be deliverable in the majority of tested viability scenarios without public subsidy.

This will require a re-run of the Drivas Jonas model to test and identify the level of affordable housing that can delivered without public subsidy in the majority of tested scenarios. The Drivas Jonas study shows that even with a 20% affordable housing target, the target is undeliverable in 46% of tested scenarios. If the model used more appropriate assumptions, particularly on land values, build cost and section 106/CIL tariffs the amount of undeliverable scenarios would be even higher (see below).

Timewell Properties Ltd are also concerned that the Affordable Housing Viability Study's (DJD, July 2010) methodology is based on inaccurate and unrepresentative assumptions which has resulted in a less than robust and credible evidence base. As an example, the viability testing has disregarded the JCS policy requirement for homes to achieve Code for Sustainable Home level 6 by 2015 and the cost of meeting this requirement. Also, the levels of public subsidy factored in to the model demonstrate scheme viability with public subsidy seem very generous. The ability to attract such levels of grant is questioned.

Timewell Properties Ltd also suggests that the GNDP's interpretation of the Viability Appraisal's results is also flawed. The GNDP contend that the 40% affordable housing target is justified because it can be shown to be viable in a "...significant number of the scenarios modelled". However, the "significant" number of instances where the target can be considered viable is only 30%. The report actually shows that in 60% of the tested scenarios, the 40% affordable housing figure cannot be achieved without public subsidy and in 10% of cases it is marginal. If more representative and accurate assumptions were used, the amount of scenarios shown as viable would be somewhat less, both with and without public subsidy. This suggests that the 40% affordable housing target is undeliverable, and therefore unjustified in viability terms.

Timewell Properties Ltd note that the focussed changes to Policy 4 (FC1) include additional flexibility to enable the proportion of affordable housing to be reduced and the tenures amended where development schemes are unviable. However, it is Timewell Properties Ltd view that the Policy's affordable housing target should be set at a level that can be demonstrated to be deliverable without public subsidy in the majority of cases, rather than be an aspirational target.

Statement of Focussed Changes (Joint Core Strategy)

S - 11885 - 8710 - FC1 Housing Delivery and supporting text - None

11885 Support

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Blue Living (David Copeland) [8710]

Agent: N/A

Full Text: Blue Living supports GNDP's intentions but has some reservations on the direction and timing of the JCS's wording, namely:

* In a market which has seen marked changes over the past three years and is bound to see equally marked shifts over the period to 2026 why fix a figure at all? - there are sufficiently robust models available, such as that produced by GVA Grimley for the HCA, which can measure viability in any given phase of development and can be reviewed and re-run as necessary. So by all means a 40% target but subject always to viability ('where viable')

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* In a market which has seen marked changes over the past three years and is bound to see equally marked shifts over the period to 2026 why fix a figure at all? - there are sufficiently robust models available, such as that produced by GVA Grimley for the HCA, which can measure viability in any given phase of development and can be reviewed and re-run as necessary. So by all means a 40% target but subject always to viability ('where viable')

Statement of Focussed Changes (Joint Core Strategy)

O - 11932 - 8726 - FC1 Housing Delivery and supporting text - i, ii, iii

11932 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Persimmon/Hopkins Homes/Taylor Wimpey [8726] **Agent:** Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

Proportion of affordable housing

The policy requires the proportion of affordable housing to be based on the most up to date housing needs assessment for the plan area. This suggests that the proportion of affordable housing may change without subjecting the policy to further testing through the development plan process. We consider that to be unsound. The proportion of affordable housing to be sought must be set out in policy where it can be properly tested for its impact on delivery and viability.

Variable targets

We consider that the variable approach to target is unsound.

PPS3 requires that LDDs should set out the range of circumstances in which affordable housing will be required. The PPS advises that this could include setting different proportions for a series of site-size thresholds, but that this needs to consider the likely impact upon overall levels of housing delivery and creating mixed communities. In this latter regard the PPS advises that local authorities should take account of the need to deliver low cost market housing as part of the overall mix.

Whilst PPS3 allows for a range of targets to be set, we do not consider that the Core Strategy as currently drafted is justified and that it does not take into account sufficiently the potential impact on housing delivery.

We consider that the variable targets set out in FC1 are unsound as they are not justified by the evidence base nor are they likely to be effective.

The differential targets in the policy are likely to distort the market. They will make smaller sites more attractive to the detriment of the major sites. Delivery of these major sites is central to the achieving the strategy and in order to ensure the scale of new homes needed, both market and affordable can be delivered. The major sites have significant infrastructure costs not associated with smaller sites. Often much of this infrastructure needs to be delivered upfront, for example, strategic roads and sewer provision in order to enable a number of developers to commence development.

FC1 effectively provides a premium for smaller sites. The effect of the policy is likely to be delay to the delivery of the strategic sites, and hence market and affordable homes. This is likely to mean that, in order to maintain a five year supply, sites would be released in less favourable/sustainable locations. Such sites will be smaller, and hence attract less affordable housing. The policy is also likely to lead to dispersed development rather than encourage the delivery of the strategy as set out.

The Core strategy needs to be founded on a recognition of the factors which impact upon the delivery of strategic sites. Such sites have significant upfront infrastructure costs. They also provide significant community gain on site. We fully acknowledge the need to provide a mix of housing. However, we do not consider the plan as drafted to be sound.

The targets are derived from the affordable housing viability study. We consider a number of assumptions underlying that study to be flawed.

The study sets out (at 8.4) that Drivers Jonas Deloitte's research suggests additional costs of £7,000 per unit to achieve Code Level 4. At page 31 it is suggested that this adds around 7 - 9% to construction costs. No evidence is presented to substantiate these estimates of increase in costs. We consider those figures to be a substantial underestimate of the cost. Research by the Zero Carbon Hub (ZCH) 'Defining a Fabric Energy Efficiency Standard for zero carbon homes' published in November 2009 identified that the medium costs of achieving the energy efficiency requirements for Code Level 3 to be in the range of 9 - 11%. Adding the further requirements for achieving Code Level 3 in its entirety will be significantly more than the 9 - 11% noted in the ZCH findings. We therefore consider that the assumption of a 7 to 9% addition to build costs is wholly insufficient for assessing the construction costs of Code Level 4.

The Viability Study also assesses the impact of Code 5. The Core Strategy proposes no policy requirements in relation to Code Level 5 and we therefore question why the study has looked at this. Policy 3 seeks to require Code Level 6 from 2015 and it is this impact which should have been assessed by the study in order to inform policy. Code 6 is likely to be adding between 35 and 40% to the cost base, according to CLG's latest costs review. Given that a significant amount of development is likely to take place on strategic sites post 2016 (or 2015 if Policy 3 is approved) FC1 needs to be founded on an assessment of the construction costs of delivering Code 6. The Affordable Housing Viability report states that Code 5 makes a large proportion of options unviable. However, from the report it is unclear which options that applies to. We do not consider that is an appropriate basis upon which policy can be adopted.

We also consider the study likely to underestimate the S106/CIL contributions. The study assumes contributions of between £7,000 and £15,000 per unit. Further work is underway in relation to the CIL targets. The Greater Norwich Infrastructure Needs and Funding Study October 2009 considered a range of tariffs across the JCS area, some considerably in excess of those set out in the Affordable Housing Viability Study. Greater clarity is required from GNDP as to the proposed levels of contribution to be sought from development to enable a reasoned assessment to be made of the affordable housing contributions.

Statement of Focussed Changes (Joint Core Strategy)

O - 11932 - 8726 - FC1 Housing Delivery and supporting text - i, ii, iii

11932 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

The study assess viability based on a notional one hectare site. The results are then extrapolated to assess viability on all sites. We consider that approach to be unsound. The circumstances pertaining to sites of one hectare cannot be simply grossed up and be said to apply to strategic sites. The major sites have significant infrastructure costs not associated with smaller sites. Often much of this infrastructure needs to be delivered upfront, for example, strategic roads and sewer provision in order to enable a number of development to commence and progress on a parts of the site concurrently. This upfront investment has significant implications for cash flow. Major sites also provide significant community gain on site.

The variable targets effectively provide a premium for smaller sites and are likely to distort the market. The effect of the policy is likely to be delay to the delivery of the strategic sites, and hence market and affordable homes. This is likely to mean that, in order to maintain a five year supply, sites would be released in less favourable/sustainable locations. Such sites will be smaller, and hence attract less affordable housing and fewer community benefits. The policy is likely to lead to dispersed development rather than encourage the delivery of the strategy as set out.

The Core Strategy needs to be founded on a recognition of the factors which impact upon the delivery of strategic sites. Delivery of the major sites is central to the achieving the strategy and in order to ensure the scale of new homes needed, both market and affordable can be delivered. However, we do not consider the plan as drafted to be sound and the differential targets in the policy are likely to distort the market. They will make smaller sites more attractive to the detriment of the major sites.

We do not consider the viability study to be a sound basis on which to set thresholds.

Summary:

A number of the assumptions which underlie the Affordable Housing Viability study are flawed and therefore an inappropriate basis upon which to set policy.

The approach to variable thresholds is likely to distort the market and hinder the delivery of the strategic growth locations.

The approach to strategic sites needs to take into account the factors which affect their delivery and cannot be based on general assumptions about a notional site and simply grossed up.

Statement of Focussed Changes (Joint Core Strategy)

O - 11938 - 8547 - FC1 Housing Delivery and supporting text - i, ii, iii

11938 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

Proportion of affordable housing

The policy requires the proportion of affordable housing to be based on the most up to date housing needs assessment for the plan area. This suggests that the proportion of affordable housing may change without subjecting the policy to further testing through the development plan process. We consider that to be unsound. The proportion of affordable housing to be sought must be set out in policy where it can be properly tested for its impact on delivery and viability.

Variable targets

We consider that the variable approach to target is unsound.

PPS3 requires that LDDs should set out the range of circumstances in which affordable housing will be required. The PPS advises that this could include setting different proportions for a series of site-size thresholds, but that this needs to consider the likely impact upon overall levels of housing delivery and creating mixed communities. In this latter regard the PPS advises that local authorities should take account of the need to deliver low cost market housing as part of the overall mix.

Whilst PPS3 allows for a range of targets to be set, we do not consider that the Core Strategy as currently drafted is justified and that it does not take into account sufficiently the potential impact on housing delivery.

We consider that the variable targets set out in FC1 are unsound as they are not justified by the evidence base nor are they likely to be effective.

The differential targets in the policy are likely to distort the market. They will make smaller sites more attractive to the detriment of the major sites. Delivery of these major sites is central to the achieving the strategy and in order to ensure the scale of new homes needed, both market and affordable can be delivered. The major sites have significant infrastructure costs not associated with smaller sites. Often much of this infrastructure needs to be delivered upfront, for example, strategic roads and sewer provision in order to enable a number of developers to commence development.

FC1 effectively provides a premium for smaller sites. The effect of the policy is likely to be delay to the delivery of the strategic sites, and hence market and affordable homes. This is likely to mean that, in order to maintain a five year supply, sites would be released in less favourable/sustainable locations. Such sites will be smaller, and hence attract less affordable housing. The policy is also likely to lead to dispersed development rather than encourage the delivery of the strategy as set out.

The Core strategy needs to be founded on a recognition of the factors which impact upon the delivery of strategic sites. Such sites have significant upfront infrastructure costs. They also provide significant community gain on site. We fully acknowledge the need to provide a mix of housing. However, we do not consider the plan as drafted to be sound.

The targets are derived from the affordable housing viability study. We consider a number of assumptions underlying that study to be flawed.

The study sets out (at 8.4) that Drivers Jonas Deloitte's research suggests additional costs of £7,000 per unit to achieve Code Level 4. At page 31 it is suggested that this adds around 7 - 9% to construction costs. No evidence is presented to substantiate these estimates of increase in costs. We consider those figures to be a substantial underestimate of the cost. Research by the Zero Carbon Hub (ZCH) 'Defining a Fabric Energy Efficiency Standard for zero carbon homes' published in November 2009 identified that the medium costs of achieving the energy efficiency requirements for Code Level 3 to be in the range of 9 - 11%. Adding the further requirements for achieving Code Level 3 in its entirety will be significantly more than the 9 - 11% noted in the ZCH findings. We therefore consider that the assumption of a 7 to 9% addition to build costs is wholly insufficient for assessing the construction costs of Code Level 4.

The Viability Study also assesses the impact of Code 5. The Core Strategy proposes no policy requirements in relation to Code Level 5 and we therefore question why the study has looked at this. Policy 3 seeks to require Code Level 6 from 2015 and it is this impact which should have been assessed by the study in order to inform policy. Code 6 is likely to be adding between 35 and 40% to the cost base, according to CLG's latest costs review. Given that a significant amount of development is likely to take place on strategic sites post 2016 (or 2015 if Policy 3 is approved) FC1 needs to be founded on an assessment of the construction costs of delivering Code 6. The Affordable Housing Viability report states that Code 5 makes a large proportion of options unviable. However, from the report it is unclear which options that applies to. We do not consider that is an appropriate basis upon which policy can be adopted.

We also consider the study likely to underestimate the S106/CIL contributions. The study assumes contributions of between £7,000 and £15,000 per unit. Further work is underway in relation to the CIL targets. The Greater Norwich Infrastructure Needs and Funding Study October 2009 considered a range of tariffs across the JCS area, some considerably in excess of those set out in the Affordable Housing Viability Study. Greater clarity is required from GNDP as to the proposed levels of contribution to be sought from development to enable a reasoned assessment to be made of the affordable housing contributions.

Statement of Focussed Changes (Joint Core Strategy)

O - 11938 - 8547 - FC1 Housing Delivery and supporting text - i, ii, iii

11938 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

The study assess viability based on a notional one hectare site. The results are then extrapolated to assess viability on all sites. We consider that approach to be unsound. The circumstances pertaining to sites of one hectare cannot be simply grossed up and be said to apply to strategic sites. The major sites have significant infrastructure costs not associated with smaller sites. Often much of this infrastructure needs to be delivered upfront, for example, strategic roads and sewer provision in order to enable a number of development to commence and progress on a parts of the site concurrently. This upfront investment has significant implications for cash flow. Major sites also provide significant community gain on site.

The variable targets effectively provide a premium for smaller sites and are likely to distort the market. The effect of the policy is likely to be delay to the delivery of the strategic sites, and hence market and affordable homes. This is likely to mean that, in order to maintain a five year supply, sites would be released in less favourable/sustainable locations. Such sites will be smaller, and hence attract less affordable housing and fewer community benefits. The policy is likely to lead to dispersed development rather than encourage the delivery of the strategy as set out.

The Core Strategy needs to be founded on a recognition of the factors which impact upon the delivery of strategic sites. Delivery of the major sites is central to the achieving the strategy and in order to ensure the scale of new homes needed, both market and affordable can be delivered. However, we do not consider the plan as drafted to be sound and the differential targets in the policy are likely to distort the market. They will make smaller sites more attractive to the detriment of the major sites.

We do not consider the viability study to be a sound basis on which to set thresholds.

Summary:

We do not consider the viability study to be a sound basis on which to set thresholds for affordable housing. The differential targets are likely to act to slow delivery on the major growth locations. Further work is required which looks specifically at major developments and how they are delivered rather than making assumptions about such sites based on a notional single hectare site.

Statement of Focussed Changes (Joint Core Strategy)

O - 12090 - 8310 - FC1 Housing Delivery and supporting text - i, ii, iii

12090 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: If i know then so should you

Statement of Focussed Changes (Joint Core Strategy)

O - 12100 - 8309 - FC1 Housing Delivery and supporting text - i, ii, iii

12100 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: The public at large have not been given sufficient time nor given a proper and fair consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12115 - 8500 - FC1 Housing Delivery and supporting text - i, ii

12115 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Mr Hugh Ivins [8500]

Agent: N/A

Full Text:

Summary:

FC1

1) greater clarity is required to define the requirement (numbers rounded, upwards from 0.5). Since the proportion 0.5 is itself less than half of a whole number, the requirement should start at 'upwards of 0.6. Or, upwards from, but not including 0.5

2) There should be a recognition that the affordable housing requirements of each District are significantly different, by adding ---sought, 'within each District', may be reduced ---

Statement of Focussed Changes (Joint Core Strategy)

O - 12156 - 1781 - FC1 Housing Delivery and supporting text - None

12156 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

Policy FC1 Affordable Housing

We believe the changes being proposed are unsound and we would object for the following reasons.

1. The change to require all developments to include affordable housing removes choice. Those who are able to afford to build their own houses will be permitted to exclude themselves from the egalitarian process being proposed. This is discriminatory. Many people would not choose to live on estates with such a high proportion of non-ownership residents. They will be unable to do so if this strategy is implemented.
2. The Drivers, Jones Report (Affordable Housing Viability Survey) sets out viability tests, which are assessed only by comparison to the profitability for a developer. This biases all subsequent assessment because there is no incentive for developers to do other than seek new greenfield sites. Such a process is not sustainable or desirable.
3. The source of public subsidy referred to in Policy FC1 is no longer available. Whether it is a centrally funded or a locally imposed Community infrastructure Levy it would be unwise for it to be used to justify unviable development.
4. Given the case law used as precedence in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable addition.

Statement of Focussed Changes (Joint Core Strategy)

O - 12191 - 8234 - FC1 Housing Delivery and supporting text - i, ii, iii

12191 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary: Peter Wilkinson FC1

The basis on which this policy has been formalised is fundamentally flawed. As suggested in Lothbury Property Trust Company Ltd's objection to Policy 4 of the Pre-Submission Stage Joint Core Strategy Consultation, and supported by the Inspectors Conclusions from the Exploratory Meeting for the Joint Core Strategy, a Housing Viability Assessment has been undertaken. However, there are significant flaws that render all calculations with regards to the viability of housing schemes inaccurate:

1. The Council have assumed a figure of £7,000 per unit is requested towards all Section 106 contributions and future CIL costs not exceeding £15,000 (higher option) (see attachment 1 - Council's Affordable Housing Viability Study). This would appear to be a significant undervaluation, as this only just exceeds the education contribution for individual properties (£6,436 - see attachment 2). Some current developments at present take advantage of capacity within existing schools to reduce this figure, but this situation cannot be maintained. The suggested figures, particularly the Section 106 figure, do not even cover frequently requested requirements, such as open space. In addition, significant additional costs are usually necessary for a variety of requirements, including highways, archaeology, flood risk/drainage and ecology. Ground works, infrastructure and developer contingency costs also have the potential to significantly increase the associated costs with developing a site.

A good example of this is the current application submitted by Lothbury Property Trust Company Ltd at Brook and Laurel Farm, Thorpe St. Andrew (Application No. 20090886). With education requirements, on site open space provision, extra highway infrastructure, drainage costs etc, it is estimated that c. £18.6 million is required for the residential element of the scheme, or £31,000 per dwelling. This is 4.3 times that estimated in the Housing Viability Assessment. The figure in this example is comparable to that identified as necessary for a residential tariff for funding infrastructure for the Growth Area within Broadland District (£28,603 per dwelling in the Greater Norwich Infrastructure Needs and Funding Study (October 2009) - see attachment 3). This supports a considerably higher figure and discredits lower figures cited by the Council in the Affordable Housing Viability Assessment. Such a variation clearly indicates that the Council's assumptions regarding costs are inaccurate and compromises the resultant viability calculations.

2. The Council's estimates regarding land values and how these have been fed into the different scenarios are questionable. In the Growth Triangle, most housing development will take place on greenfield land. The Council Affordable Housing Viability Study suggests a land value of between £500,000 - £750,000 per hectare - see attachment 4. Even given the recession, a higher range of £750,000 - £950,000 per hectare (300,000 - £400,000 per acre) should be considered low, and this is notably higher than that suggested by the Council.

Whilst it is accepted that land values have fallen in recent years, given the timeframe for which work towards the LDF commenced, most developers would have secured options on greenfield sites before the reduction in values occurred. Before the recession, values were easily double those in the Council's Viability Assessment. This changes the base figure against which subsequent calculations need to be undertaken.

At the Consultation Meeting with regards to the Affordable Housing Viability Assessment in Spring 2010, I made the point that actual worked examples, particularly of land values, need to be provided to justify the assessment. Drivers Jonas Deloitte, who prepared the Affordable Housing Viability Assessment on behalf of the Greater Norwich Development Partnership accepted that this would provide clarity to the workings. No such worked examples have emerged.

The Council's Affordable Housing Viability Assessment has taken an inconsistent approach towards market forces, so that a positive spin is placed on the results. It is only current land values that have been incorporated into the calculations, whilst disregarding values before the recession occurred, even though it is from this period that options on land would have been agreed. In contrast, the prediction for development values are based on both current and revised upward values, on the assumption of development beyond the recession. This creates a strong bias in favour of the Council for supporting the Viability Appraisal, despite references to the report taking a 'pessimistic' stance.

3. Despite the inaccuracies noted above, insertion of the low cost figures into calculations in the Affordable Housing Viability Assessment, still only identifies 30% of schemes as being likely to support 40% affordable housing for the 'base' assumptions (chart 1) and 47% on the 'refined' (i.e. higher market values) assumptions (chart 3). Neither figure concludes that the market can support such a high percentage. These figures are increased on the assumption that grant money is available to assist with construction of affordable housing. At present, the Coalition Government are significantly reducing the monies available for such grants, and no assumptions on such monies being available can realistically be incorporated. This point is stressed in the Inspector's Conclusions from the Exploratory Meeting for the Joint Core Strategy (page 3). In light of the inaccuracies cited in points 1 and 2 above (and the lack of 'real' examples), the level of sites capable of providing a 40% affordable housing contribution will be lowered even further below the

Statement of Focussed Changes (Joint Core Strategy)

O - 12191 - 8234 - FC1 Housing Delivery and supporting text - i, ii, iii

12191 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

figures identified by the Council's report. It is not logical to incorporate a policy setting out a requirement, in which a high proportion of developments cannot comply. Setting an unrealistic target is instigating unnecessary additional work for developers and discouraging development as a whole within the area.

The inaccuracies in the background information does not provide a robust and credible evidence base upon which to formulate policies. This section of the Core Strategy is therefore contrary to PPS 12 paragraphs 4.36, 4.37 and 4.52 (+ accompanying box) and is thus unsound.

Works required to become sound

Further evaluation of Affordable Housing Viability incorporating the analysis identified above.

Attachment 1: Extract from the greater Norwich Development Partnership's Affordable Housing Viability Study (July 2010)

8.9 Housing Market

We have sought to reflect changes in strength in housing markets. The main areas that this affects are:

- * a developer's perceived risk of undertaking a scheme, and consequently the profit that the developer seeks; and
- * the demand from the market for any completed units, and consequently the rate at which completed units sell.

Our study appraises three scenarios to reflect weak, neutral or strong market conditions, with sales rates varying between 2 and 7 units per month, and developer's profits as follows:

- * 17.5% on cost in a strong market;
- * 20% on cost in a neutral market; and
- * 25% on cost in a weak market.

8.10 Section 106 and CIL Costs

Section 106 costs can vary greatly from scheme to scheme. We have followed guidance available on Broadland's and Norwich's websites, which suggest around £7,000 per unit is sought.

We have discussed this sum with members of GNDP, who ordinarily work in a planning capacity within the Local Authorities that make up GNDP. Whilst both lower and higher costs are secured on a site specific basis, it was believed that £7,000 per unit is representative of an approximate average over the policy area.

The future of the Community Infrastructure Levy (CIL) is uncertain, as is the quantum of any payments that may be required as part of it. As an aside from the main study, we have been asked to consider the impact on viability of potential CIL costs.

We have considered the impact of the following planning obligation costs:

- * £7,000 per unit on all units (current section 106 cost assumption);
- * £10,000 per unit on private market units only (potential future CIL scenario);

and

- * £15,000 per unit on private market units only (potential future CIL scenario).

8.11 Other

As part of the Study, we have assumed a number of fixed costs. These include:

- * Professional fees: 12% of construction cost
- * Contingency: 5% of construction cost
- * Planning costs: £300 per unit
- * Finance: 6.5%
- * Sales & Marketing Costs: 3.5% of GDV

Our Study, as requested by GNDP, builds on work already undertaken by a group of consultants led by AECOM. This work formed part of the evidence base for the Joint Core Strategy for Broadland, Norwich and South Norfolk, and was also used to inform the development of the Greater Norwich Integrated Development Plan.

22 Greater Norwich Development Partnership Affordable Housing Viability Study

Attachment 2: Broadland District Council Section 106 Contributions Proposal for Application 20090886 - 600 houses plus employment land (July 2010)

The breakdown of the types of dwellings proposed for this development has been expressed as a percentage in the application pack. This results in the following types and numbers of dwellings:

- 1 bed flats: 96
- 2 bed flats: 12

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O - 12191 - 8234 - FC1 Housing Delivery and supporting text - i, ii, iii

12191 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

3 bed houses: 300
4 + bed houses: 180

Total: 588

The application form states that are 600 houses, but the percentages do not add up to this total. For the purposes of these calculations the figure of 588 will be used. As such the education contribution will be less than will be required, but the library, fire hydrant and transport contributions will be made on the assumption of 600 dwellings..

Education Contribution

The cost per dwelling for a house (multi-bed) is £6,436.
The cost per dwelling for a flat (multi-bed) is £3,218.

Houses: $6436 \times 480 = £3,089,280$
Flats: $3,218 \times 12 = £38,616$

Total: = £3,127,896

However, there is no nursery contribution required as there is spare capacity in the area so £489 can be taken off the cost per each dwellinghouse (note this was not on the flats in the first instance).

Houses: $489 \times 492 = £240,588$

Total contribution with nursery contribution taken off = £2,887,308

Furthermore there is some spare capacity at the new Dussindale Primary School and 128 of the proposed properties are exempt from contribution.

Cost per house of primary provision = £2,958
 $£2,958 \times 128 = £378,624$

This figure is then subtracted from the total contribution with nursery contribution taken off.

Total education contribution = £2,508,684

Library Contribution

£60 per dwelling, so $£60 \times 600$ dwellings.

Total = £36,000

Highways Contribution

It should be noted that only rough figures have been received from the Highways department.

Public transport contributions for employment = £1m

Public transport contributions for housing = £1m+
(The developer will need to talk to the local bus operators for an accurate figure to be agreed)

Travel plan for employment (5 years) = Circa £200,000

Travel plan for housing = £279,000
(£465 per dwelling for 5 years)

Total = £2,479,000

Fire Hydrant Contribution

1 hydrant per 50 dwellings at £763 per hydrant:
 $£763 \times 12 = £9,156$

2 hydrants required for the commercial uses:
 $£763 \times 2 = £1,526$

Statement of Focussed Changes (Joint Core Strategy)

O - 12191 - 8234 - FC1 Housing Delivery and supporting text - i, ii, iii

12191 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Total = £10,682

However, it should be noted that the provision of fire hydrants would be accepted as a condition and as such will not be included in the final total.

Open Space Contribution

No open space contribution has been calculated as the application indicates that 20ha are proposed with this development. This is not broken down into what is publically accessible and what is not, but the plans show significant areas of publically accessible open space. A calculation has shown that around 3.5ha of open space would need to be provided on site or else contributed towards, and it is considered that this would be easily provided for on the site.

Total contribution required = £5,023,684

Total contribution proposed = £600,000

Total deficit = £4,423,684

Note: This excludes the fire hydrant contribution.

Attachment 3: Extract from the Greater Norwich Infrastructure Needs and Funding Study (October 2009)

G R E A T E R N O R W I C H I N F R A S T R U C T U R E N E E D S & F U N D I N G S T U D Y | 1 0

The key to a successful tariff model is that it is affordable and viable in the marketplace so as not to prevent development being brought forward. We have therefore undertaken a detailed analysis on the local property market and in the report we set out a few of the most salient points that will affect the setting of tariff policy and the potential income that can be derived from developer contributions. In setting the level of tariff, consideration needs to be given to the different market conditions within the region and we have identified a number of discernible sub-markets within Greater Norwich with different cost and value characteristics.

We have identified the cost of infrastructure for each of the growth locations and identified the cost of infrastructure by dwelling. This provides an understanding of the level of required developer contributions per dwelling required to bridge the funding gap.

Given the market context both geographically and over time we have carried out an assessment of the level of tariff that could be achieved based on current and strong market conditions across each of the residential market areas. In setting the charging schedule, consideration will need to be given to applying a variable rate of tariff, particularly for schemes that come forward in the short term, which would otherwise be unviable.

We undertook appraisals for each of the districts, with two sets of appraisals being carried out for South Norfolk for each of the housing market areas identified in this district. The appraisals were based on current sales values and values being achieved during the last peak in the housing market. Given the different nature of residential development within Norwich city in comparison with South Norfolk and Broadland i.e. higher density and predominantly flatted schemes, we applied different density and unit mix assumptions for Norwich City.

To provide an indication of the potential maximum tariff levels that could be applied to residential developments we have used a single hectare development model to assess viability.

Potential Tariff Requirements

* Within Norwich a tariff of £19,469 per dwelling would be needed if contributions from residential schemes are to bridge the funding gap identified. Although this could be achievable for an average sized scheme with housing grant, due to the individual nature of development sites within Norwich flexibility is needed to take into account site specific viability issues.

* Within Broadland the residential tariff required to fund the infrastructure needed for the Sprowston growth area is £28,603 significantly higher than for the rest of Broadland at £6,844. Whilst the tariff rate required for the rest of Broadland is achievable, the rate needed for the growth area is challenging and is likely to only be viable for agricultural sites with no alternative use value and where housing grant is available. This will still require landowners to agree to sell their land at significantly lower values in comparison to values that have been achieved previously.

* The residential tariff requirements for the South Norfolk strategic growth locations range from £10,992 in Cringleford to £61,071 in Wymondham. The detailed requirements by growth location are provide in Table 16-5. Given the range of funding gaps within these areas, the Norwich Housing Market area of South Norfolk and mid South Norfolk area residential schemes will generally only be able to achieve the tariff rate required to cover the funding gap in strong market conditions, on agricultural sites with no alternative use value, and where housing grant is available. However this will require landowners to agree to sell their land at significantly lower values in comparison to those that have been achieved previously.

Attachment 4: Extract from the greater Norwich Development Partnership's Affordable Housing Viability Study (July 2010)

Note: The composite reference number in the box at the top of the page is made up of the following information: Object/Support - Representation Number - Respondent Number - Plan Reference - Soundness Tests (if applicable).

Statement of Focussed Changes (Joint Core Strategy)

O - 12191 - 8234 - FC1 Housing Delivery and supporting text - i, ii, iii

12191 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

7 Benchmarking: Our Approach

7.1 Introduction

Assessing the propensity of each individual landowner within the Policy Area to sell their site is effectively impossible. There are an indeterminable number of variables and personal circumstances to consider, many of which could not be quantified or modelled as part of a 'high level' study such as this.

That said, a study such as this must, as stated in PPS3, "reflect an assessment of the likely economic viability of land for housing within the area". That is not to say that it must consider every conceivable site in the policy area, but the types of 'likely' sites. The accepted benchmark measure is the relationship between EUV and residual land value.

Brownfield

For Brownfield sites, arriving at a benchmark is relatively straight forward. A recent planning case law decision (Berkeley Homes vs West Oxfordshire District Council) suggested that a reasonable uplift was considered to be 10%. There is little other guidance regarding the quantum of uplift from EUV. We have taken a prudent approach and assumed 15% as a reasonable uplift from each of the three Brownfield EUVs listed in Section 6.5.

Greenfield

The comparison with Greenfield sites is more complex. The EUV of, for example arable land, is typically low when compared to land with other uses. The uplift that the landowner would expect depends greatly on the perceived likelihood of gaining a planning consent for development. A key factor in determining this is whether or not the site is allocated (identified in a Regional or Local Plan as being earmarked for future development).

We propose to benchmark against three types of Greenfield land:

- Greenfield - unallocated
- Greenfield - allocated (lower value)
- Greenfield - allocated (higher value)

Unallocated Greenfield land may be bought speculatively for a developer's land bank. Such land can transact for between £10,000 and £200,000 per hectare, or around x1 to x15 of the Greenfield EUV in the previous section. The price tends to increase as the perceived chance of gaining consent increases. We propose to use the mid point, £100,000.

When a Greenfield site is allocated the market's perceived risk of gaining planning consent is reduced, but significant risks remain. The value of such sites can vary greatly due to a wide range of factors. We have sought to estimate two reasonable benchmark values. In doing this, we have had regard to a number of things, such as:

- current site availability;
- guideline/average published prices;
- the costs and risks involved in buying Greenfield land for residential development;
- residual appraisal analysis; and
- the value of unallocated Greenfield land.

The VOA's average land price for Norwich, as published in January 2010 was £1,700,000 per hectare, for "a Greenfield suburban site of 0.5 hectare, ripe for development with planning permission being available". The VOA state that their land prices are intended to be "illustrative rather than definitive", and in our view tend to be based on historical transactions.

Greenfield sites currently available include a site for sale with planning consent in Sprowston. The site amounts to 1.7 Ha site and is available for £2,500,000 (£1,470,000 per hectare asking price) with residential consent.

We have sought to balance landowners' return with the risks associated with buying Greenfield land for residential development. These include, but are not limited to: planning risk; potential for unforeseen and abnormally high infrastructure costs; promotion costs; changeable timescales; political risk; and occasional reliance on other sites to deliver.

With this in mind, the benchmarks we have chosen are:

- Greenfield - allocated (lower value): £500,000 (30 times EUV)
- Greenfield - allocated (upper value): £750,000 (50 times EUV)

These measures are several multiples of EUV, and around a third to a half of the approximate value of Greenfield land with consent.

Summary

In summary, our benchmarks are:

Type of site	EUV	Reasonable Uplift	Benchmark
Brownfield - high	£1,500,000	15%	£1,725,000
Brownfield - mid	£1,000,000	15%	£1,150,000
Brownfield - low	£500,000	15%	£575,000
Greenfield - allocated, upper value	£15,000	x 50	£750,000
Greenfield - allocated, lower value	£15,000	x 33	£500,000
Greenfield - unallocated	£15,000	x 7	£100,000

Where our calculated residual land value is less than EUV, we have assumed it is not viable and if it is in excess of the Benchmark, we have deemed it viable. For land values between EUV and the Benchmark, we have classified them as marginal.

Statement of Focussed Changes (Joint Core Strategy)

O - 12210 - 8018 - FC1 Housing Delivery and supporting text - i, ii

12210 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Norwich Green Party (Mr Stephen Little) [8018]

Agent: N/A

Full Text:

Summary:

We would agree that achieving targets of around 40% would not be possible in semi-urban or rural areas without the area in question being excellently served by locally accessible infrastructure which is relevant to the needs of those on relatively low incomes. However, this is not a justification for reducing or relaxing the overall target, but instead for ensuring that such infrastructure is in place. While it is probably sensible to adopt lower targets for smaller developments, to take the overall target below 40% would severely jeopardise the chance of new housing meeting local need. Therefore, to ensure an adequate level of provision, a target of above 40% for large developments should be a requirement.

On the subject of viability of affordable housing, it is important to take into account the form of housing as well as type of tenure. As well as encouraging higher densities of housing and a full mix of forms to include flats and terraces, policy could also look at encouraging imaginative solutions such as co-housing in new developments which would enable residents of all incomes to benefit from an inbuilt network of social support and shared facilities. It should be emphasised here that this is not a proposal for lower quality housing, but for housing that fully reflects demographic change and the continuing trend toward smaller households while simultaneously freeing up land for green space, microgeneration, allotments etc.

Statement of Focussed Changes (Joint Core Strategy)

O - 12224 - 8809 - FC1 Housing Delivery and supporting text - i, ii, iii

12224 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Landstock Estates Ltd & Landowners Group [8809] **Agent:** Barton Willmore (Mr Andrew Wilford) [8811]

Full Text:

Summary:

1.1. These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group in response to the Greater Norwich Development Partnerships (GNDP) consultation on its 'Statement of Focussed Changes' (SoFC). It is our understanding that the SoFC has been specifically published to address what the GNDP considers are those issues that require further changes following the articulation by the Inspectors' of their concerns over the submitted Joint Core Strategy (JCS) before, during and after the Exploratory Meeting (EM) held on 13th May 2010.

1.2. The SoFC has been accompanied by two supporting documents, namely, a Sustainability Appraisal Report (July 2010) (SA) prepared by Scott Wilson and an Affordable Housing (AH) Viability Study (July 2010) prepared by Drivers Jonas Deloitte.

1.3. The SoFC only relates to 3 elements of the JCS. These are:

- * Provision of Gypsy and Traveller Pitches;
- * Affordable Housing; and,
- * The North East Norwich Strategic Allocation.

1.4. Representations have been made at every stage of the JCS process; and it is noted that this current consultation can only comment on soundness issues relating to the SoFC. We are mindful of this fact, but would like to remind the GNDP of our ongoing soundness concerns relating to the submitted JCS as set out in our previous representations at the Issues and Options Stage, the Preferred Option Stage and the two Counsel's Opinions.

1.5. In summary, we conclude that the SoFC does not represent an adequate attempt by the GNDP to address the matters of particular concern raised at the EM on 13th May 2010 and as set out in the 15 page Note (EIP 35) circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' (dated 24th May 2010). EIP 35 set out that there were 6 areas of concern on which the Inspectors considered that further work was needed. These related to:

- i) Infrastructure;
- ii) Affordable Housing;
- iii) Distribution of Development, particularly in relation to public transport opportunities;
- iv) Northern Distributor Road;
- v) Sustainability Issues; and
- vi) The North-East Growth Triangle.

1.6. It is therefore surprising that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 (EIP 36) to clarify and note the Inspectors' concerns and set out the GNDP's suggested way forward on a number of these matters.

1.7. Notwithstanding our concerns regarding the additional matters upon which the GNDP has chosen not to respond, we set out below our comments on the focused changes, namely, those in relation to affordable housing and the proposed strategic allocation at NE Norwich, and the SA addendum and AH Viability Study that support the SoFC. Even in respect of these matters, alone, we contend that the JCS remains unsound.

2.1 Tetlow King Planning have reviewed the Affordable Housing Section and supporting AH Viability Report prepared by Drivers Jonas Deloitte (DJD). A representative from Tetlow King and a representative from Landstock Estates and Landowners Group attended the stakeholder event relating to identified Affordable Housing issues and run by DJD on 28th June 2010.

- i) Background

2.2 The reason for the focused changes in relation to affordable housing policy stemmed from concerns of the Inspectors and the Affordable Housing Assessor (EIP 29) about evidence to support a 40% affordable housing target on all sites of 5 or more units. Whilst this was the primary concern, the Inspectors raised other matters, including the lack of any plan-wide affordable housing target. In addition, in making the Focussed Changes the GNDP has introduced other data and policy changes which require examination. The comments which follow address the approach which has been adopted by the GNDP in relation to affordable housing policy, and makes constructive criticisms over the soundness of the policies.

- ii) FC1

Statement of Focussed Changes (Joint Core Strategy)

O - 12224 - 8809 - FC1 Housing Delivery and supporting text - i, ii, iii

12224 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

2.3 There is a fundamental problem with the first paragraph in FC1. Seeking a 'proportion' is all very well, but in the second sentence it states that the proportion (or target) will be based on the most up to date needs assessment. This is not what paragraph 29 of PPS3 requires. This advises that targets should be arrived at after consideration of a number of other factors including economic viability, and, likely levels of finance including availability of public finance. PPS3 does not state that targets should be based on housing need alone.

2.4 We have considered the DJD report but we do not find any indication that smaller sites can only support lower proportions of affordable housing, Work carried out by consultants Adams Integra in 2009 for Aylesbury Vale District Council in connection with testing viability of affordable housing policies in a Core Strategy found:

'32. Our appraisals show that scheme size is not a determinant of viability in itself. This is a consistent finding across all our studies. There is nothing within the appraisal maths which suggests that smaller or larger sites tend to be any more or less viable. It really does come down to site specifics - the nature of sites and the proposals for them relative to existing use, specific costs etc.'

vi) Annex 1

2.19 nnex 1 sets out how the overall affordable housing target for JCS was calculated. As discussed above, we note it bases its calculations on the 2005/06 Housing Needs Assessment. We understand that based on the delivery of 1,306 affordable units between 2005/06 and 2007/08 that there is a residual requirement of 11,878 from 2008 to 2026. However, we disagree that: 'The policy target is higher, because the Government's basic needs assessment model makes the assumption that any backlog at the time of the study is eliminated over the next five years. This therefore has the effect of increasing the affordable housing targets and in the particular the social rented element'.

2.20 Firstly, the overall shortfall in affordable housing in the housing needs assessment was calculated from adding the existing backlog at that time and the newly arising need, minus supply. This found 13,184 affordable housing units were required over the JCS plan period. Therefore, the 1,306 completed affordable units between 2005/06 to 2007/08 went towards reducing the overall affordable requirement.

2.21 Secondly, Table 2.0 breaks down the Affordable Housing Requirement for 2009-2026. This is based on the 2006 HNA and affordable housing completions between 2005/06 to 2008/09. Any of the original backlog remaining is still included in the total affordable housing requirement for 2009/10 to 2025/26. When looking at this as a percentage of total housing requirements, the required affordable housing is 33% for the whole GNDP area and therefore 40% is not justified by the evidence base.

Table 2.0 Affordable Housing Requirement for 2009-2026

Affordable Housing Requirement:

2006 - 2026

Backlog (ORS 05/06) 1,403

Newly arising need 2005/06-2025/2026 (21 x 561) (ORS 05/06) 11,781

Total 13,184

Minus Completions 2005/06 - 07/08 1,306

Total AH Requirement 08/09 - 25/26 (18 years) 11,878

Minus Completions 2008/09 697

Total AH Requirement 09/10 - 25/26 (17 years) 11,181

Overall Housing Requirement 2008-2026 (set out in JCS) 35,660

Minus Completions 2008/09 1,745

Total housing Requirement 2009-2026 (17 years) 33,915

Percentage AH Requirement of Total Housing Requirement

$(11,181 / 33,915) \times 100 = 33\%$

2.22 The figure in the SoFC covers the period from 2008-2026 and does not take into account the completions from 2008/09. After looking at the available sites in the GN area, we have identified a potential 67 affordable units to be provided from sites of developments between 5 and 15 units. This was calculated from the list of potential sites provided in the SHLAA. Table 2.1 outlines that considering affordable housing commitments and completions to date, along with potential delivery from 5-15 unit sites, there is a remaining requirement of 7,385 affordable units from 2009-2026, to be sought from sites of 16+ units.

Table 2.1 Remaining Requirement of Affordable Units 2009 -2026

Total AH Requirement identified in Focussed Changes 11,860

Minus Existing Commitments 2008 (identified in Annex 1 of Focussed Changes) 3,711

Minus AH Completed 2008/09 697

Minus Potential supply 5-15 unit schemes 67

Statement of Focussed Changes (Joint Core Strategy)

O - 12224 - 8809 - FC1 Housing Delivery and supporting text - i, ii, iii

12224 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Remaining Requirement 7,385

5.1 Our view of the soundness of the JCS is well documented in previous representations and engagement at the EM on 13th May 2010. It is still clear that the matters of Affordable Housing and the Strategic Allocation remain unsound. There is no doubt that the short consultation on these issues has not repaired the position as outlined by the Inspectors. The real problem is that with a front loaded plan which has been developed over a number of years, is it is impossible to play catch up on such significant issues.

5.2 The SoFC fails to address all the outstanding issues as set out by the Inspectors and has attempted to retro-fit the Sustainability Appraisal and JCS to suit the inclusion of the 'Strategic Allocation' and justification for the current level of Affordable Housing.

5.3 The JCS continues to be unsound, and the GNDP have failed to adequately consult on the SA or undertaken the very basic necessity of scoping correctly to allow an updated SA to be undertaken.

Statement of Focussed Changes (Joint Core Strategy)

S - 12240 - 8815 - FC1 Housing Delivery and supporting text - None

12240 Support

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: NHS Norfolk (Mr David Stonehouse) [8815]

Agent: N/A

Full Text:

Summary:

While NHS Norfolk does not question the legality or soundness of the decision to be more flexible on the proportion of affordable homes, we are concerned to see that this remains as high a priority as possible. Providing affordable homes improves health outcomes allowing families on lower incomes to spend limited resources on healthy food, heating fuel in winter in addition to also providing stability and improved psychological wellbeing. Affordable homes can also provide opportunities for independent living for young or vulnerable people thereby having positive impact on their health benefits.

Statement of Focussed Changes (Joint Core Strategy)

O - 12246 - 1823 - FC1 Housing Delivery and supporting text - None

12246 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

We believe the changes being proposed are unsound and we would object for the following reasons;

1. The change to require all developments to include affordable housing removes choice. Those who are able to afford to build their own houses will be permitted to exclude themselves from the egalitarian process being proposed. This is discriminatory. Many people would not choose to live on estates with such a high proportion of non-ownership residents. They will be unable to exercise this choice if this strategy is implemented.
2. The Drivers Jones Report (Affordable Housing Viability Survey) sets out viability tests which are assessed only by comparison to the profitability for a developer. This biases all subsequent assessment because there is no incentive for developers to do other than seek new greenfield sites. Such a process is not sustainable or desirable.
3. The source of public subsidy referred to in Policy FC1 is no longer available. Whether it is a centrally funded or a locally imposed Community Infrastructure Levy it would be unwise for it to be used to justify unviable development.
4. Given the case law used as precedent in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable addition.

Statement of Focussed Changes (Joint Core Strategy)

O - 12253 - 8047 - FC1 Housing Delivery and supporting text - None

12253 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary:

We believe the changes being proposed are unsound and we would object for the following reasons.

1. The change to require all developments to include affordable housing removes choice. Those who are able to afford to build their own houses will be permitted to exclude themselves from the egalitarian process being proposed. This is discriminatory. Many people would not choose to live on estates with such a high proportion of non-ownership residents. They will be unable to do so if this strategy is implemented.
2. The Drivers, Jones Report (Affordable Housing Viability Survey) sets out viability tests, which are assessed only by comparison to the profitability for a developer. This biases all subsequent assessment because there is no incentive for developers to do other than seek new greenfield sites. Such a process is not sustainable or desirable.
3. The source of public subsidy referred to in Policy FC1 is no longer available. Whether it is a centrally funded or a locally imposed Community infrastructure Levy it would be unwise for it to be used to justify unviable development.
4. Given the case law used as precedence in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable addition.

Statement of Focussed Changes (Joint Core Strategy)

O - 12277 - 8826 - FC1 Housing Delivery and supporting text - None

12277 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Taylor Wimpey Developments & Hopkins Homes
(Mr John Holden) [8826] **Agent:** N/A

Full Text:

Summary:

In their response to the Joint Core Strategy Proposed Submission Document (November 2009), TWD/HH raised concerns in connection with the proportion of affordable housing contained within Policy 4. Although we acknowledge the comment within Policy 4 to the effect that account will be taken by the local planning authorities of site characteristics and the economic viability of provision, that Policy appeared to be seeking to establish an inflexible ratio of affordable housing. That concern was underpinned by the observation at paragraph 5.28 that "experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions. We remain sceptical with regard to the appraisals and conclusions contained within the Affordable Housing Viability Study (July 2010) produced for GNDP by Drivers Jonas Deloitte. In particular, we do not agree with the conclusion at page 34 of the AHVS that "in our opinion a strategic policy wide target of 40% affordable housing is appropriate. However, we do accept the contention that there are "several scenarios where this will not be viable, especially where private sales values are low and construction costs or benchmark values are high. We would question the relevance/validity of the AHVS in the light of local land values and the 'benchmarks' utilised by DJD. Whilst we are wary of the AFVS, we consider that the policy wording contained within the Statement of Focussed Changes represents a more realistic/pragmatic consideration of the issue of affordable housing. We have noted the comment at paragraph 4.1.1 of the Sustainability Appraisal Report on the FCs that "an important decision has been taken to revise the requirements that are placed on developers in terms of the delivery of affordable housing. This decision has been taken because of evidence that suggests that a more stringent policy would be counter-productive as a result of making development non-viable and hence hindering development of housing of any sort (affordable or housing to be sold on the open market)." We endorse the comment at FC1 that "the proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing." We support the reason for FC1 given at page 2 of the Statement of Focussed Changes which indicates that the policy approach gives more emphasis to the recognition "that housing development viability is critical to the delivery of affordable houses on mixed tenure developments." We have also noted and support the rationale for FC1 which is to clarify that where the viability of a development is shown to be at risk, "negotiations will include consideration of reducing the overall amount of affordable housing sought, and the balance of tenures within the affordable housing to restore the viability of the scheme."

Statement of Focussed Changes (Joint Core Strategy)

O - 12281 - 8828 - FC1 Housing Delivery and supporting text - None

12281 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: The Leeder Family (Mr John Holden) [8828]

Agent: N/A

Full Text:

Summary:

In its response to the Joint Core Strategy Proposed Submission Document (November 2009), The Leeder Family raised concerns in connection with the proportion of affordable housing contained within Policy 4. Although we acknowledge the comment within Policy 4 to the effect that account will be taken by the local planning authorities of site characteristics and the economic viability of provision, that Policy appeared to be seeking to establish an inflexible ratio of affordable housing. That concern was underpinned by the observation at paragraph 5.28 that "experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions."

We remain sceptical with regard to the appraisals and conclusions contained within the Affordable Housing Viability Study (July 2010) produced for GNDP by Drivers Jonas Deloitte. In particular, we do not agree with the conclusion at page 34 of the AHVS that "in our opinion a strategic policy wide target of 40% affordable housing is appropriate." However, we do accept the contention that there are "several scenarios where this will not be viable, especially where private sales values are low and construction costs or benchmark values are high." We would question the relevance/validity of the AHVS in the light of local land values and the 'benchmarks' utilised by DJD. Whilst we are wary of the AFVS, we consider that the policy wording contained within the Statement of Focussed Changes represents a more realistic/pragmatic consideration of the issue of affordable housing. We have noted the comment at paragraph 4.1.1 of the Sustainability Appraisal Report on the FCs that "an important decision has been taken to revise the requirements that are placed on developers in terms of the delivery of affordable housing. This decision has been taken because of evidence that suggests that a more stringent policy would be counter-productive as a result of making development non-viable and hence hindering development of housing of any sort (affordable or housing to be sold on the open market)." We endorse the comment at FC1 that "the proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing." We support the reason for FC1 given at page 2 of the Statement of Focussed Changes which indicates that the policy approach gives more emphasis to the recognition "that housing development viability is critical to the delivery of affordable houses on mixed tenure developments." We have also noted and support the rationale for FC1 which is to clarify that where the viability of a development is shown to be at risk, "negotiations will include consideration of reducing the overall amount of affordable housing sought, and the balance of tenures within the affordable housing to restore the viability of the scheme."

Statement of Focussed Changes (Joint Core Strategy)

O - 12284 - 8825 - FC1 Housing Delivery and supporting text - i, ii

12284 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Hethersett Land Ltd (Hethersett Consortium) (Mr John Long) [8825] **Agent:** N/A

Full Text:

Summary:

Summary

Hethersett Land Ltd suggests that the proposed focussed changes to Policy 4: Affordable Housing (FC1) fails the "Justified" and "Effective" soundness tests because:

- 1) The proposed focussed changes are not founded on robust and credible evidence and do not represent the most appropriate strategy when considered against the reasonable alternatives.
- 2) The proposed focussed changes maintain a policy requirement for 40% affordable housing (to be provided on sites of 16 dwellings) that the GNDP's own evidence (Affordable Housing Viability Study, DJD, July 2010) demonstrates cannot be delivered in the majority of tested scenarios, without public subsidy

Reasons

Hethersett Land Ltd does not consider the evidence underpinning the JCS Focused Changes 1-4, concerning Policy 4: Housing Delivery to be robust and therefore credible. The Affordable Housing Viability Study's (Drivas Jonas, July 2010) methodology is based on flawed assumptions and lacks transparency.

In particular, the Study's assumptions in relation to the availability of public subsidy; the effect of complying with the JCS Policy 3's requirement for all new homes to achieve Code for Sustainable Homes level 6 by 2015; the likely level of CIL and the dismissive comments regarding the effect of various tenure splits and overall affordable housing percentages etc. are called into question.

For example, the Study acknowledges achieving Code for Sustainable Homes level 5 would render most schemes unviable, yet it appears to have disregarded the JCS policy requirements to reach even higher Code levels. Also, the Study suggests that tenure split is stated as having only a subtle effect on scheme viability affecting only the most marginal of schemes. However even within the DJD Viability Study (table page 28) it is highlighting a difference of £152 per m2 (option 1 (60/40 split) £1084 - option 3 (85/15 split) £932) and this does not take into account more realistically viable tenure splits of more than 40% of the affordable requirement being provided as intermediate tenures.

Neither is it believed that the public subsidy assumptions used by DJD are sound at £46,900 per rented unit and £26,100 per intermediate unit. At best it could be assumed that these levels will drop to nearer half of the rented level and zero for the intermediate, although in reality the Home and Communities Agency are putting their partners on notice that affordable housing delivered through section 106 agreements needs to be provided without the use of any public subsidy at all. There have been a number of recent cases within the GNDP area where the HCA's stance has been thus and no public subsidy has yet been provided for schemes despite the financial non viability justification being forwarded to the HCA. In these instances the affordable homes element has proposed to be reduced to between 19% and 26%, which in all instances still result in financial non viability. Grant is still being sought on these schemes and other changes negotiated to make them viable even at these reduced affordable housing levels.

The Study's assumptions on CIL, will need to reflect the findings of the GVA study currently ongoing at the time of writing these representations Notwithstanding Hethersett Land's concerns over the Study's methodology, the assumptions used and its

results, the GNDP's interpretation of the results in attempting to justify the 40% policy target for sites of 16 or more dwellings is also flawed.

The Study's findings suggest that the 40% target is in the majority of cases unviable, without public subsidy. Section 9.3 (Key Findings) of the Viability Study reports that in 60% of the testing scenarios the 40% affordable housing figure cannot be achieved without public subsidy. It also reports that in only 30% of testing scenarios can 40% affordable housing be achieved without social housing grant.

This being the case, and given the state of the public purse, and the likely inability for public funding to be available to subsidise all affordable housing in the Greater Norwich area, the GNDP's suggestion that this represents a "significant" number of instances, sufficient to justify the 40% target is unsound. The Study's findings (Chart 2) also suggest that even with a 20% affordable housing target, without public subsidy, schemes will be unviable in 46% if the tested scenarios and marginal in 8% of cases. In other words, even with a 20% affordable housing target, where no public subsidy is available it is only viable in 46% of tested scenarios.

If the Study had used more robust and credible assumptions, the results on scheme viability would have been even less. Hethersett Land Ltd notes and welcomes the proposed focussed changed to Policy 4 (FC1)'s additional flexibility to enable the proportion of affordable housing to be sought to be reduced and the tenures amended where development schemes are unviable. However, given that the 40% target is unlikely to be deliverable in the majority of cases (even on the basis of flawed assumptions), Hethersett Land Ltd suggests that the Policy's starting point for any such negotiations, should be reduced to a level that is in the majority of cases likely to be deliverable. Detailed evidence relating to the testing of the 20% and 30% targets has not been publicly shared and this would undoubtedly be helpful to set into context the 40% proposal by DJD.

Conclusions

Hethersett Land Ltd have concerns over the robustness and credibility of the evidence underpinning the Focussed changes to Policy 4. The assumptions in relation to the likely availability of public subsidy and the financial viability of schemes being required to deliver 40% affordable with a tenure split between 60/40 and 85/15 appear unjustified. In addition there is insufficient transparency in relation to the actual figures used within the DJD study to give them

Statement of Focussed Changes (Joint Core Strategy)

O - 12284 - 8825 - FC1 Housing Delivery and supporting text - i, ii

12284 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

credibility or enable third party scrutiny. We would welcome the opportunity to review the findings. Hethersett Land Ltd also have concerns in the way the GNDP have translated the study's findings and used them to attempt to justify the Policy's 40% Affordable Housing Target for scheme of 16 dwellings or more. The GNDP's approach has led to a Policy target that in the majority of cases is not viable. The lack of viability would be even more pronounced if the Study used more accurate and realistic assumptions. For these reasons Hethersett Land suggest that the Focussed Change FC1 fails the justified and effective soundness test

Suggested change

Hethersett Land Ltd suggest that the affordable housing requirement on sites for 16 dwellings or more (0.6ha) should be reduced from 40% to a level that in the majority of testing scenarios cases is viable without the provision of public subsidy. Based on the Study's findings, this would be at a level less than 20%.

Suggested Change

Hethersett Land Ltd contend that the affordable housing requirement on sites for 16 dwellings or more (0.6 ha) should be reduced from 40% to a level that in the majority of testing scenarios is demonstrated to be viable without public subsidy.

Unfortunately the DJD Study does not publicly share the results of the 20% and 30% affordable housing targets and it is therefore suggested that these findings be shared as part of the consultation process in order for a more 'justifiable' target to be considered and proposed. It is anticipated that a target closer to 20% without the use of public subsidy would be more deliverable, and therefore justifiable. If the JCS Policy 4 maintains the 40% affordable target, then the evidence used by DJD to conclude that 40% is a justifiable target should be included within the JCS as an appendix in order to ensure financial non viability justifications and negotiations can be easily made in the future in a transparent manner.

Statement of Focussed Changes (Joint Core Strategy)

O - 12287 - 8834 - FC1 Housing Delivery and supporting text - None

12287 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Trustees of the Gurloque Settlement, Norwich Consolidated Charities, teh Great Hospital, Norwich and of Anguish's Educational Foundation (Mr John Holden) [8834]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

In their response to the Joint Core Strategy Proposed Submission Document (November 2009), the Trustees raised concerns in connection with the proportion of affordable housing contained within Policy 4. Although we acknowledge the comment within Policy 4 to the effect that account will be taken by the local planning authorities of site characteristics and the economic viability of provision, that Policy appeared to be seeking to establish an inflexible ratio of affordable housing. That concern was underpinned by the observation at paragraph 5.28 that "experience locally shows that 40% is the maximum achievable on sites without subsidy, in normal market conditions." We remain sceptical with regard to the appraisals and conclusions contained within the Affordable Housing Viability Study (July 2010) produced for GNDP by Drivers Jonas Deloitte. In particular, we do not agree with the conclusion at page 34 of the AHVS that "in our opinion a strategic policy wide target of 40% affordable housing is appropriate." However, we do accept the contention that there are "several scenarios where this will not be viable, especially where private sales values are low and construction costs or benchmark values are high." We would question the relevance/validity of the AHVS in the light of local land values and the 'benchmarks' utilised by DJD. Whilst we are wary of the AFVS, we consider that the policy wording contained within the Statement of Focussed Changes represents a more realistic/pragmatic consideration of the issue of affordable housing. We have noted the comment at paragraph 4.1.1 of the Sustainability Appraisal Report on the FCs that "an important decision has been taken to revise the requirements that are placed on developers in terms of the delivery of affordable housing. This decision has been taken because of evidence that suggests that a more stringent policy would be counter-productive as a result of making development non-viable and hence hindering development of housing of any sort (affordable or housing to be sold on the open market)." We endorse the comment at FC1 that "the proportion of affordable housing sought may be reduced and the balance of tenures amended where it can be demonstrated that site characteristics, including infrastructure provision, together with the requirement for affordable housing would render the site unviable in prevailing market conditions, taking account of the availability of public subsidy to support affordable housing." We support the reason for FC1 given at page 2 of the Statement of Focussed Changes which indicates that the policy approach gives more emphasis to the recognition "that housing development viability is critical to the delivery of affordable houses on mixed tenure developments." We have also noted and support the rationale for FC1 which is to clarify that where the viability of a development is shown to be at risk, "negotiations will include consideration of reducing the overall amount of affordable housing sought, and the balance of tenures within the affordable housing to restore the viability of the scheme."

Statement of Focussed Changes (Joint Core Strategy)

O - 12290 - 8320 - FC1 Housing Delivery and supporting text - i, ii

12290 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Sunguard Homes [8320]

Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text:

Summary: Summary

Sunguard Homes Ltd object to the focussed changes to JCS Policy 4: Affordable Housing (FC1) and considers that the focussed changes fail the "Justified" and "Effective" soundness tests because of shortcomings in the preparation of the evidence base underpinning the Policy and the GNDP's interpretation of the results in justifying the Policy. The result of which is potentially an undeliverable policy, particularly in the short to medium term.

In particular, Sunguard Homes Ltd object to revised Policy 4's requirement that 40% affordable housing is to be provided on sites of 16 dwellings or more when the GNDP's own evidence as set out in the Affordable Housing Viability Study, DJD, July 2010) demonstrates that the 40% target is undeliverable in the majority of tested viability scenarios, without public subsidy.

Sunguard Homes Ltd suggests that the Policy 4 Affordable Housing target should be set at a level that can be demonstrated to be deliverable in the majority of tested viability scenarios without public subsidy. The Drivas Jonas Report should have identified the level of affordable housing that is deliverable in the majority of tested scenarios without public subsidy, in order to properly underpin the Policy.

Sunguard Homes Ltd also are concerned that some of the assumptions in the Affordable Housing Viability Study, DJD, July 2010) are incorrect which has resulted in a less than robust and credible evidence base.

Main Representation

The evidence underpinning revised Policy 4: Housing Delivery is neither robust nor credible. The Affordable Housing Viability Study's (Drivas Jonas, July 2010) methodology is based on flawed assumptions and lacks transparency.

For instance, no regard has been had in the viability testing to the cost of achieving Code for Sustainable Homes level 6 by 2015 as required by the JCS and little regard has been had to the affects of changing the tenure split, including intermediate tenures. The report also fails to show what level of affordable housing can be delivered without public subsidy in the majority of cases. No results are shown to demonstrate the viability of scenarios with 20% and 30% affordable housing targets. The levels of public subsidy assumed are also questionable.

Notwithstanding the shortcomings of the Viability Appraisal's assumptions, Sunguard Ltd also suggests that the GNDP's interpretation of the Viability Appraisal's results is also flawed.

Sunguard Homes Ltd call into question the GNDP's conclusion that because the Viability Report shows that 40% affordable housing can be delivered without public subsidy (on sites of 16 or more dwellings) in 30% of the tested instances that this is sufficient to demonstrate the policy's deliverability.

Sunguard Homes Ltd suggest that the GNDP has ignored the Viability Study's results that suggest in 60% of the tested scenarios, the 40% affordable housing figure cannot be achieved without public subsidy and in 10% of cases it is marginal.

Sunguard Homes Ltd notes that the focussed changes to Policy 4 (FC1) include additional flexibility to enable the proportion of affordable housing to be reduced and the tenures amended where development schemes are unviable. However, the Policy's starting point of a 40% target on sites of 16 or more is demonstrably undeliverable and therefore unsound and should have been changed. The Policy's starting point should be reduced to a level that is in the majority of cases deliverable, without public subsidy.

Suggested change

Sunguard Homes Ltd suggest that the affordable housing requirement on sites for 16 dwellings or more (0.6ha) should be reduced from 40% to a level that in the majority of testing scenarios cases is viable without the provision of public subsidy. The Drivas Jonas Study should be re-run and include testing scenarios at 15%; 20% and 30% affordable housing to demonstrate a target that is deliverable without public subsidy in the majority of cases.

Statement of Focussed Changes (Joint Core Strategy)

O - 12292 - 8589 - FC1 Housing Delivery and supporting text - i, ii, iii

12292 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589] **Agent:** N/A

Full Text:

Summary: Legal Compliance and Soundness

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It has yet to be considered by the GNDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

This letter constitutes a response to the Changes being proposed by the GNDP to the Joint Core Strategy. As the format prepared by the Partnership is unwieldy, requiring repetitive comment and multiple submissions, this representation has been prepared in the form of a letter in which the Policy reference numbers are quoted for the sake of clarity.

The reliance on the use of computers to gain access to this consultation and to respond is unhelpful to the GNDP because it excludes so many contributors. The explanation given for the changes is brief to the point of being inadequate and the way in which respondents are supposed to respond is complex and off-putting. There is no public inclusion at all.

This consultation contains no proposals to deal with the defects of the original Joint Core Strategy. There does not appear to be any attempt to reduce the number of critical issues. There are no proposals which address the lack of flexibility in the scheme. There is no consideration of alternatives in the event that any of the critical elements should fail.

Policy FC1 Affordable Housing

The changes being proposed are unsound and are objected to for the following reasons.

1. The overall number of houses was formerly dictated by the Regional Spatial Strategy. This has been abandoned along with its assumptions yet the GNDP have not changed the numbers in their plans to meet these changed circumstances. Those numbers should not be used to justify the affordable housing; it is not a sound basis for development.
 1. The Drivers, Jones Report (Affordable Housing Viability Survey) which is intended to justify this policy sets out viability tests, which are assessed only by comparison to the profitability for a developer. This biases all subsequent assessment because there is no incentive for developers to do other than seek new Greenfield sites. Such a process is neither sustainable nor desirable.
 2. Given the case law used as precedence in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. This renders the policy unsound. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable situation.
 3. The change to require all developments to include affordable housing removes choice. Those who are able to afford to build their own houses will be permitted to exclude themselves from the egalitarian process being proposed. This is discriminatory. Many people would not choose to live on estates with such a high proportion of non-ownership residents. They will be unable to do so if this strategy is implemented.
 4. Government plans will remove the source of public subsidy referred to in Policy FC1. Whether it is replaced by a Centrally funded or a locally imposed Community Infrastructure Levy it would be unwise for it to be used to justify unviable development.

Comments on the Report on Affordable Housing
by Drivas Jones

Statement of Focussed Changes (Joint Core Strategy)

O - 12292 - 8589 - FC1 Housing Delivery and supporting text - i, ii, iii

12292 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Introduction

This report has been commissioned by the GNPD to provide the evidence base to support the Joint Core Strategy. Some of the background details are not available to those making representations and so these comments are based only upon the information given in the report.

Methodology

The report is based almost entirely on RICS concepts of residual land values despite the preliminary statements that these are highly subjective and can only be considered as a guide. It is also acknowledged that this methodology is theoretical, requiring modelling.

It continues to rely on the Regional Policy statements enabled through the Regional Spatial Strategy and notes the variations that occur over the areas covered by the Joint Core Strategy which are then dismissed without explanation. Given this it is surprising that there are no financial sensitivities showing the impacts of variation in these values.

Observations

Executive Summary and Recommendations

1. Viability is described but the sensitivity of the three given factors to potential changes are not. This should be a basic element in any financial appraisal.
2. The sales values in the lowest point of the market make a large proportion of scenarios unviable regardless of affordable targets or other inputs. This makes a huge assumption about the future of the market.
3. The viability increases greatly where there is an element of social housing grant. Yet the recommendations state otherwise.
4. It suggests wording the policy on Affordable Housing to account for site-specific viability. This supports the contention in our submission that this is not a sensible policy but biased towards a developers negotiating position.
5. Modifying PPS3 is proposed in the Focused changes but this would reduce viability as well as diversity as we have pointed out elsewhere.
6. The proposal suggests wording the policy to encourage developers to demonstrate that their scheme is unviable.
- 7.

Viability

1. It is sensible to set the level of viability, where a developer and landowner can agree a price. However, to adopt the models used for achieving this outcome have potential drawbacks.
2. The case law quoted shows that the process is by and large driven by the developers and it is acknowledged that there is a huge lobby backing them.
3. The only government model described is used to demonstrate whether or not a scheme requires housing grant, before it will prove viable. Given the point made in 6 above this seems to be unduly prejudicial.
4. The bias towards the requirement to develop on Greenfield sites is clear in section 6 but this is not sustainable on other grounds.
5. Farmland is being traded at £10,000 - £20,000 per hectare in the policy area. However, when this includes planning consent it exceeds £M1.5 per hectare. Yet the benchmarks chosen for the modeling are set optimistically. It is also important to note that this carries a qualification that these are 'intended to be illustrative rather than definitive' and tend to be based on historic transactions.
6. The proposal seems to suggest wording the policy to encourage developers to demonstrate that their scheme is unviable.
7. This carries a very large caveat 'We believe our benchmarks are well reasoned but they can only ever be a guide. There are a great deal of site specific variables which can affect existing use value.'

Sustainable Homes

1. It is sensible to set the level of viability, where a developer and landowner can agree a price. However, to adopt the models used for achieving this outcome has potential drawbacks when applied to non standard scenarios. The study quotes a building costs range of £1040- £1190 and then a premium for Code 4 and Code 5. There is no reference to Code 6 although at a recent Planning Committee meeting in Broadland a representative of the Wherry Housing Association in responding to members question quoted a 50% premium for such a house.
2. To achieve Level 5, the costs would have a significant impact on viability, adding 30% to total construction and making a large proportion of the options unviable, if other inputs are unchanged.
3. The ECO Town in particular has been promoted on world leader status with the highest standards and yet the context of this report and the plans for an exemplar scheme do not even meet the proposed BREEM standards.
4. Sustainable homes are only one feature of an ECO town. To this has to be added extensive additional infrastructure cost and amenity projects. The impact on viability of this is not addressed.

Section 106 and CIL

1. The indication is that the value of Section 106 Agreements have a financial value of somewhere in the region of £7,000.
2. The inclusion of CIL contributions at £10,000 and £15,000 per unit as sought by the GNPD will be payable on all privately owned dwellings. The report says this will make only a small difference to viability but whatever means are used to collect it is clear that private owners will pay a premium for their dwellings. This does not seem a reasonable proposal to be made by local councils.
3. Social Housing Grants are the subject of some uncertainty but the report says that the base case is for no housing grant.

On this base case 60% are unviable, 10% is marginal and only 30% is viable. Even using the refined case the viability

Statement of Focussed Changes (Joint Core Strategy)

O - 12292 - 8589 - FC1 Housing Delivery and supporting text - i, ii, iii

12292 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

only rises to 38%. This seems inconsistent with the recommendations, which state that the 40% affordable housing target is achievable in a significant number of scenarios, without housing grant. This does not seem a reasonable interpretation of these figures.

Conclusion

The Drivas Jones report has been commissioned by the GNDP, though unusually there is no record of the terms of reference or the discussions which preceded this compilation. There is a suggestion in the text where the authors express their own opinion that not all the figures have been derived from original work though no doubt they have been modeled on computer. Was the data supplied by the GNDP or its constituent councils? There is no bibliography to support the data.

The text does indicate that it is in many cases subjective and once even the term highly speculative is used. It is concluded that this is not a sound basis to support the contentions made by the planners.

Statement of Focussed Changes (Joint Core Strategy)

O - 12318 - 6993 - FC1 Housing Delivery and supporting text - ii

12318 Object

Focussed changes to Policy 4

FC1 Housing Delivery and supporting text

Respondent: Thorpe and Felthorpe Trust [6993]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text:

Summary:

The GNDP's Affordable Housing Viability Study (July 2010) stated that the approach to testing viability is that a residual land value must be sufficiently greater than the Existing Use Value (or alternative use value) of a site. The assessment then includes a comprehensive set of residual land value calculations based upon averages of both land values and costs and then makes a broad assumption that development land viability would then be assessed by whether or not the resultant value for the land exceeds existing land value. Deliverability of housing growth is a key objective of the Core Strategy. Development of this complexity and nature may have to adopt complex funding approaches involving longer term infrastructure investment - a simplistic formula to fund affordable housing should be resisted. In any case, landowners will not bring forward land if it merely results in exceeding the existing land value. In reality, a developer will only bring forward land if the grant of planning permission creates a uplift in value that is considered to deliver a reasonable profit once sunk capital, planning requirements, risk and capital taxation have been taken into account. The three dragons viability model commonly used in London assumes a developer profit of 15%. (NB that schemes within London are likely to be served by an existing infrastructure framework which is a quite different development context to the creation of a sustainable urban extension). Clearly, if time frames are longer and development schemes require a more complex infrastructure approach a higher developer profit should be assumed. It is also noted that the Affordable Housing Viability Study (July 2010) attempts to benchmark what is considered to be a reasonable uplift in value to provide the necessary incentive for landowners to bring forward their land. However, it is considered that it is not been adequately demonstrated that the benchmarks adopted in the assessment have successfully provided this incentive across a range of sites within the area. Return is related to risk and this is a complex and therefore inherently more risky project for the developer. As has been clearly evidenced over the last four years. In addition, existing use values vary from site to site due to differing characteristics including use, condition of the site, specific market characteristics, tenant arrangements etc. As such, what is considered to be a reasonable uplift in value on one site may not be the case for other sites. The TFT therefore question the evidence base that supports the affordable housing policy. It is considered that the way the policy is currently worded will potentially deter developers/land owners from bringing land forward, which will in turn be detrimental to effectiveness of the Joint Core Strategy. As such, it is considered that it may be more appropriate to include detailed affordable housing requirements, with regard to quantum sought and thresholds, within the related development management policies that will emerge from each of the constituent local planning authorities that comprise the GNDP.

Statement of Focussed Changes (Joint Core Strategy)

O - 11739 - 8606 - FC2 changes to paragraph 5.29 - i, ii, iii

11739 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Sara Beaven [8606]

Agent: N/A

Full Text: I do not think that the percentage of affordable homes should be less than 40%. This is the type of housing that is required in this area, not more private housing for inward migrants looking to commute to London. If the developers do not want to fund the 40% affordable homes then they should not be allowed to build the development.

Summary: I do not think that the percentage of affordable homes should be less than 40%. This is the type of housing that is required in this area, not more private housing for inward migrants looking to commute to London. If the developers do not want to fund the 40% affordable homes then they should not be allowed to build the development.

Statement of Focussed Changes (Joint Core Strategy)

S - 11886 - 8710 - FC2 changes to paragraph 5.29 - None

11886 Support

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Blue Living (David Copeland) [8710]

Agent: N/A

Full Text: As with FC1, there is general support with the following caveat:

Housing needs assessments are, of themselves, of limited use since they always show demand considerably in excess of supply as measured through housing land availability assessments. Blue Living would prefer to see greater emphasis on housing market assessments which link the ability of open market sales in effect to subsidise the cost of affordable housing with or without grant.

Summary: As with FC1, there is general support with the following caveat:

Housing needs assessments are, of themselves, of limited use since they always show demand considerably in excess of supply as measured through housing land availability assessments. Blue Living would prefer to see greater emphasis on housing market assessments which link the ability of open market sales in effect to subsidise the cost of affordable housing with or without grant.

Statement of Focussed Changes (Joint Core Strategy)

O - 12087 - 8310 - FC2 changes to paragraph 5.29 - i, ii, iii

12087 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [not supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12105 - 8309 - FC2 changes to paragraph 5.29 - i, ii, iii

12105 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12163 - 1781 - FC2 changes to paragraph 5.29 - None

12163 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

Given the case law used as precedence in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable addition.

2. The policy text notes that the 40% target is achievable in a significant number of the scenarios modeled without housing grant but this is later qualified by the reference to higher environmental standards. The Government is committed to these and has already said so to Councils. The Sustainability Targets referred to in the viability report note that at Code level 5 constructions costs will be 30% higher and a large proportion of options would be unviable. This would render the policy unsound.

3. The draft JCS does not quantify a density range but there is a wide discrepancy in the densities adopted by the three councils who are party to the strategy. This will result in developers being biased toward the Council who allows building to a higher density which is permitted under this policy.

Statement of Focussed Changes (Joint Core Strategy)

O - 12247 - 1823 - FC2 changes to paragraph 5.29 - None

12247 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

1. Given the case law used as precedent in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable addition.
2. The policy text notes that the 40% target is achievable in a significant number of the scenarios modeled without housing grant, but this is later qualified by the reference to higher environmental standards. The Government is committed to these standards and has already said so to Councils. The Sustainability Targets referred to in the viability report note that at Code Level 5 construction costs will be 30% higher and a large proportion of options would be unviable. This would render the policy unsound.
3. The draft JCS does not quantify a density range but there is a wide discrepancy in the densities adopted by the three councils who are party to the strategy. This will result in developers being biased toward the Council who allows building to the highest density permitted under this policy.

Statement of Focussed Changes (Joint Core Strategy)

O - 12254 - 8047 - FC2 changes to paragraph 5.29 - None

12254 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: **Wroxham Parish Council (Mrs Daphne Wyatt)**
[8047]

Agent: **N/A**

Full Text:

Summary:

4. Given the case law used as precedence in the Drivas Jones Report, it is clear that developers will just negotiate the quantity of affordable housing with the Councils. Given the present preferential position afforded to developers in the current Planning system this seems an undesirable addition.
2. The policy text notes that the 40% target is achievable in a significant number of the scenarios modeled without housing grant but this is later qualified by the reference to higher environmental standards. The Government is committed to these and has already said so to Councils. The Sustainability Targets referred to in the viability report note that at Code level 5 construction costs will be 30% higher and a large proportion of options would be unviable. This would render the policy unsound.
3. The draft JCS does not quantify a density range but there is a wide discrepancy in the densities adopted by the three councils who are party to the strategy. This will result in developers being biased toward the Council who allows building to a higher density which is permitted under this policy.

Statement of Focussed Changes (Joint Core Strategy)

O - 12276 - 8825 - FC2 changes to paragraph 5.29 - i, ii

12276 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Hethersett Land Ltd (Hethersett Consortium) (Mr John Long) [8825] **Agent:** N/A

Full Text:

Summary:

FC2 Focussed Changes to paragraph 5.29

Hethersett Land Ltd suggests that the proposed focussed changes to Paragraph 5.29 (FC2) fails the "Justified" and "Effective" soundness tests. Hethersett Land Ltd notes the proposed focussed changed to paragraph 5.29 and welcomes the acknowledgment that in some instances 40% affordable housing on site will not be viable, without public subsidy. However, Hethersett Land Ltd suggests that the assertion that "40% affordable housing target is achievable in a significant number scenarios, modelled without social housing grant" is incorrect. The paragraph should acknowledge that achieving 40% affordable housing is unlikely in most instances unless public subsidy is made available. We are aware of 'real' examples of section 106 affordable housing requirements within the GNDP area where even during the last 12 months despite proving financial non viability public subsidy has not been made available. Therefore, it is our opinion that the likelihood of public subsidy being available in the short to medium term is extremely limited and it would therefore be unsound to assume any public subsidy to support the provision of affordable housing within the GNDP area. The GNDP's own evidence is the Affordable Housing Viability Study (Drivas Jonas, July 2010) would suggest that the target is only achievable in 30% of scenarios tested. The Study reports that in 60% of testing scenarios it was unviable and in 10% marginal. Hethersett Land Ltd contend that to base a policy target that cannot be achieved in 70% of the scenarios tested is unsound. It is also misleading to suggest that 30% represents a significant proportion. Suggested changes Hethersett Land Ltd suggest that paragraph 5.29 should be amended to reflect any changes that may be made to the affordable housing targets brought about by representations and the Inspector's deliberations on the focussed changes to Policy 4 (FC1), in particular any changes to the 40% affordable housing target; In the event that Policy 4's 40% affordable housing target is not changed, paragraph 5.29 should be amended to acknowledge that in the majority of cases, achieving 40% affordable housing on sites of 16 dwellings or more is unviable in the majority of cases, rather than suggest that it is viable in "...a significant number of the scenarios modelled..".

Suggested changes

Hethersett Land Ltd suggest that paragraph 5.29 should be amended to reflect any changes that may be made to the affordable housing targets brought about by representations and the Inspector's deliberations on the focussed changes to Policy 4 (FC1), in particular any changes to the 40% affordable housing target; In the event that Policy 4's 40% affordable housing target is not changed, paragraph 5.29 should be amended to acknowledge that achieving 40% affordable housing on sites of 16 dwellings or more is unviable in the majority of cases, rather than suggest that it is viable in "...a significant number of the scenarios modelled..". It is suggested that in order for any future financial non viability arguments to be sufficiently robust and transparent for all parties that the assumptions made during the Drivas Jonas study (which enabled them to conclude that 40% was justified) be set out in an appendix to the Joint Core Strategy as a point of reference for the GNDP and land owners alike. In this way if key elements and assumptions such as public subsidy levels, sales values, build costs, Registered Provider offer prices, interest rates etc differ greatly in the future there can be taken into consideration during negotiations.

Statement of Focussed Changes (Joint Core Strategy)

O - 12279 - 8826 - FC2 changes to paragraph 5.29 - None

12279 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Taylor Wimpey Developments & Hopkins Homes
(Mr John Holden) [8826] **Agent:** N/A

Full Text:

Summary:

We endorse that element of FC2 which recognises that the provision of affordable housing is dependent upon the overall viability of developments. We are still concerned at the emphasis placed upon 40% affordable housing when considered in the context of the AHVS produced by DJD. We have noted the comment in FC2 regarding the need to consider the provision of affordable housing within the framework of site viability in prevailing market conditions. In that particular context, we have noted the comment in FC2 regarding "policy aims relating to the environmental standards of homes." It is not immediately clear how FC2 will be implemented within the background provided by Policy 3 of the Proposed Submission Document. Does the wording of FC2 mean that the GNDP objectives established in Policy 3 are overriding and will have an impact upon the amount of affordable housing that can be delivered in a particular scheme?

Statement of Focussed Changes (Joint Core Strategy)

O - 12282 - 8828 - FC2 changes to paragraph 5.29 - None

12282 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: The Leeder Family (Mr John Holden) [8828]

Agent: N/A

Full Text:

Summary:

We endorse that element of FC2 which recognises that the provision of affordable housing is dependent upon the overall viability of developments. We are still concerned at the emphasis placed upon 40% affordable housing when considered in the context of the AHVS produced by DJD. We have noted the comment in FC2 regarding the need to consider the provision of affordable housing within the framework of site viability in prevailing market conditions. In that particular context, we have noted the comment in FC2 regarding "policy aims relating to the environmental standards of homes." It is not immediately clear how FC2 will be implemented within the background provided by Policy 3 of the Proposed Submission Document. Does the wording of FC2 mean that the GNDP objectives established in Policy 3 are overriding and will have an impact upon the amount of affordable housing that can be delivered in a particular scheme?

Statement of Focussed Changes (Joint Core Strategy)

O - 12286 - 8830 - FC2 changes to paragraph 5.29 - None

12286 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Mr Robert Craggs [8830]

Agent: N/A

Full Text:

Summary:

We support the need for houses but these focused changes are now painting a worse picture of the viability of affordable homes that is going to need subsidies. So awaiting the outcome of the Spending Review makes eminent commonsense. Subsidizing a local community in order to preserve say village life and subsidizing infrastructure are concepts that tax-payers tend to accept but subsidizing developers or house owners was never a concept put to us and it seems very wrong. Good houses can be built and sold to people moving up the housing ladder and by so doing do release houses that are more affordable as market dynamics has always generated, but building affordable homes and subsidizing them with hard earned tax-payers money is set to cause problems. Affordable homes do not have to be new homes

Statement of Focussed Changes (Joint Core Strategy)

O - 12288 - 8834 - FC2 changes to paragraph 5.29 - None

12288 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Trustees of the Gurloque Settlement, Norwich Consolidated Charities, teh Great Hospital, Norwich and of Anguish's Educational Foundation (Mr John Holden) [8834]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary:

We endorse that element of FC2 which recognises that the provrsron of affordable housing is dependent upon the overall viability of developments. We are still concerned at the emphasis placed upon 40% affordable housing when considered in the context of the AHVS produced by DJD. We have noted the comment in FC2 regarding the need to consider the provision of affordable housing within the framework of site viability in prevailing market conditions . In that particular context , we have noted the comment in FC2 regarding "policy aims relating to the environmental standards of homes." It is not immediately clear how FC2 will be implemented within the background provided by Policy 3 of the Proposed Submission Document. Does the wording of FC2 mean that the GNDP objectives established in Policy 3 are overriding and will have an impact upon the amount of affordable housing that can be delivered in a particular scheme?

Statement of Focussed Changes (Joint Core Strategy)

O - 12291 - 8320 - FC2 changes to paragraph 5.29 - i, ii

12291 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Sunguard Homes [8320]

Agent: Bidwells Norwich (309) (Mr Glyn Davies) [7725]

Full Text:

Summary: FC2 Focussed Changes to paragraph 5.29

Sunguard Homes Ltd has made representations to Focussed Change FC1, in particular the 40% affordable housing target, with a view to getting this target reduced to a demonstrably deliverable level. If accepted, paragraph 5.29 would need to be changed to reflect a different affordable housing target.

In the event that Policy 4's 40% affordable housing target is not changed, paragraph 5.29 should be amended to acknowledge that without public subsidy, achieving 40% affordable housing on sites of 16 dwellings or more is unviable in the majority of cases, rather than suggest that it is viable in "...a significant number of the scenarios modelled..". The Affordable Housing Viability Study (DJD, July 2010) demonstrates that without public subsidy, the 40% affordable housing target is deliverable in only 30% of scenarios tested. The Study reports that in 60% of testing scenarios it was unviable and in 10% marginal. It is therefore misleading to suggest that 30% represents a significant proportion.

Statement of Focussed Changes (Joint Core Strategy)

O - 12293 - 8589 - FC2 changes to paragraph 5.29 - i, ii, iii

12293 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary:

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It has yet to be considered by the GNDDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

Policy FC2 Affordable Housing

Policy FC2 does not have a sound basis and should be corrected or revised.

1. See above
2. The policy states that the 40% target is achievable in a significant number of the scenarios modeled without housing grant but this is then qualified by the reference to higher environmental standards. The Government has confirmed to Councils that they are committed to these highest standards for future development. The Drivas Jones report seems to suggest otherwise. The Sustainability Targets referred to in that report note that at Code level 5 construction costs will be 30% higher and a large proportion of options would be unviable. Code 6 is not included but would render the conclusions even less valid. As it is, the policy is already unsound. The BREEM commitments to Code Level 6 are clear and Broadland District Council has already approved Housing Association developments to be built to this sustainability level. The developer led process as envisaged is flawed on environmental grounds.
3. Housing density is a significant factor in the debate on affordable housing. The draft JCS does not quantify a density range but there is a wide discrepancy in the densities adopted by the three councils who are party to the strategy. (South Norfolk with a standard density of 27-30, Broadland with a density of 30-50 and Norwich City 'at least 40'). This will result in developers being biased toward Broadland Council that allows building to a higher density because higher density will increase profitability and hence the viability for affordable dwellings. Norwich City has the least land and the greatest housing need.
4. The conclusions in the Drivas Jones report contain a number of inconsistencies. These are contained in a separate submission, which it is hoped will be considered along with this representation. (Appendix 2)

Statement of Focussed Changes (Joint Core Strategy)

O - 12319 - 6993 - FC2 changes to paragraph 5.29 - ii

12319 Object

Focussed changes to Policy 4

FC2 changes to paragraph 5.29

Respondent: Thorpe and Felthorpe Trust [6993]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text:

Summary:

The GNDP's Affordable Housing Viability Study (July 2010) stated that the approach to testing viability is that a residual land value must be sufficiently greater than the Existing Use Value (or alternative use value) of a site. The assessment then includes a comprehensive set of residual land value calculations based upon averages of both land values and costs and then makes a broad assumption that development land viability would then be assessed by whether or not the resultant value for the land exceeds existing land value. Deliverability of housing growth is a key objective of the Core Strategy. Development of this complexity and nature may have to adopt complex funding approaches involving longer term infrastructure investment - a simplistic formula to fund affordable housing should be resisted. In any case, landowners will not bring forward land if it merely results in exceeding the existing land value. In reality, a developer will only bring forward land if the grant of planning permission creates a uplift in value that is considered to deliver a reasonable profit once sunk capital, planning requirements, risk and capital taxation have been taken into account. The three dragons viability model commonly used in London assumes a developer profit of 15%. (NB that schemes within London are likely to be served by an existing infrastructure framework which is a quite different development context to the creation of a sustainable urban extension). Clearly, if time frames are longer and development schemes require a more complex infrastructure approach a higher developer profit should be assumed. It is also noted that the Affordable Housing Viability Study (July 2010) attempts to benchmark what is considered to be a reasonable uplift in value to provide the necessary incentive for landowners to bring forward their land. However, it is considered that it is not been adequately demonstrated that the benchmarks adopted in the assessment have successfully provided this incentive across a range of sites within the area. Return is related to risk and this is a complex and therefore inherently more risky project for the developer. As has been clearly evidenced over the last four years. In addition, existing use values vary from site to site due to differing characteristics including use, condition of the site, specific market characteristics, tenant arrangements etc. As such, what is considered to be a reasonable uplift in value on one site may not be the case for other sites. The TFT therefore question the evidence base that supports the affordable housing policy. It is considered that the way the policy is currently worded will potentially deter developers/land owners from bringing land forward, which will in turn be detrimental to effectiveness of the Joint Core Strategy. As such, it is considered that it may be more appropriate to include detailed affordable housing requirements, with regard to quantum sought and thresholds, within the related development management policies that will emerge from each of the constituent local planning authorities that comprise the GNDP.

Statement of Focussed Changes (Joint Core Strategy)

S - 11887 - 8710 - FC3 changes to paragraph 5.28 - None

11887 Support

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Blue Living (David Copeland) [8710]

Agent: N/A

Full Text: Once more general support but with the following reservation which applies to P5.28A and 5.28B:

* The original DJD work was heavily criticised and the updated report is still weak on large sites which are treated as abnormal when most of the serious growth will be on these sites. There is the greater question of how the proportion or indeed any contribution at all will be measured. Rather than the top down DJD "observation" Blue Living would much prefer to see a greater measure of objectivity through the use of an agreed model e.g. that provided by HCA

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Statement of Focussed Changes (Joint Core Strategy)

O - 11933 - 8726 - FC3 changes to paragraph 5.28 - i, ii, iii

11933 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Persimmon/Hopkins Homes/Taylor Wimpey [8726] **Agent:** Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

FC3

We support the need to deliver mixed and balanced communities. The needs of society for housing are wide and varied. Collectively the private and public sector need to adopt innovative and flexible approaches to meeting housing needs, especially as public funding for subsidising housing needs is likely to be extremely limited over the next few years.

PPS3 advises that LDDs should specify the size and type of affordable housing that is likely to be needed in particular circumstances. FC3, through paragraph 5.28B, advises as to GNDP's view on the split. This appears to be a policy contained with text. The status of this approach needs to be made clear. If this is a requirement then it must be included in policy so it can be appropriately tested.

Should it be proposed that the split between social rent and intermediate be included in policy, consideration needs to be given to paragraph 9 of PPS3. This sets out that a core element of Government housing policy is to widen the opportunities for home ownership. We consider that intermediate housing is a key means of achieving this. Any policy approach should seek to achieve this national objective, by enabling people to own their own home. Innovative approaches are needed to shared ownership and the boundaries between social rent and shared ownership are becoming increasingly blurred. A flexible approach is required to such matters, not simply from a viability point of view, but from a social inclusion/home ownership perspective. There is a wide range of measures which can be used to encourage this, including shared equity and discounted market homes for sale.

In terms of mix, the Core Strategy needs to recognise that strategic developments will be delivered over a considerable period of time and therefore that the suggested 85%:15% split between social rent and intermediate is inappropriate for strategic schemes, and that the target for such developments should be 60% social rent and 40% intermediate.

Summary:

In terms of mix, the Core Strategy needs to recognise that strategic developments will be delivered over a considerable period of time and therefore that the suggested 85%:15% split between social rent and intermediate is inappropriate for strategic schemes, and that the target for such developments should be 60% social rent and 40% intermediate.

Statement of Focussed Changes (Joint Core Strategy)

O - 11939 - 8547 - FC3 changes to paragraph 5.28 - i, ii

11939 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Easton Landowners Consortium [8547]

Agent: Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

We support the need to deliver mixed and balanced communities. The needs of society for housing are wide and varied. Collectively the private and public sector need to adopt innovative and flexible approaches to meeting housing needs, especially as public funding for subsidising housing needs is likely to be extremely limited over the next few years.

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Summary:

In terms of mix, the Core Strategy needs to recognise that strategic developments will be delivered over a considerable period of time and therefore that the suggested 85%:15% split between social rent and intermediate is inappropriate for strategic schemes, and that the target for such developments should be 60% social rent and 40% intermediate.

Statement of Focussed Changes (Joint Core Strategy)

O - 12083 - 8310 - FC3 changes to paragraph 5.28 - i, ii, iii

12083 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [not supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12102 - 8309 - FC3 changes to paragraph 5.28 - i, ii, iii

12102 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12170 - 1781 - FC3 changes to paragraph 5.28 - None

12170 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

1. Broadland District Council already has a policy which modifies PPS3 from a threshold of 15 to
5. It is submitted that continuing this will be a strong disincentive to providing variety in the nature of developments and should not be incorporated.
3. The numbers of Affordable houses is based upon housing need but there is a lack of transparency on the criteria set by the Housing Associations, the entitlements and geographic spread of applicants.

Statement of Focussed Changes (Joint Core Strategy)

O - 12227 - 8809 - FC3 changes to paragraph 5.28 - i, ii, iii

12227 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Landstock Estates Ltd & Landowners Group [8809] **Agent:** Barton Willmore (Mr Andrew Wilford) [8811]

Full Text:

Summary:

1.1. These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group in response to the Greater Norwich Development Partnerships (GNDP) consultation on its 'Statement of Focussed Changes' (SoFC). It is our understanding that the SoFC has been specifically published to address what the GNDP considers are those issues that require further changes following the articulation by the Inspectors' of their concerns over the submitted Joint Core Strategy (JCS) before, during and after the Exploratory Meeting (EM) held on 13th May 2010.

1.2. The SoFC has been accompanied by two supporting documents, namely, a Sustainability Appraisal Report (July 2010) (SA) prepared by Scott Wilson and an Affordable Housing (AH) Viability Study (July 2010) prepared by Drivers Jonas Deloitte.

1.3. The SoFC only relates to 3 elements of the JCS. These are:

- * Provision of Gypsy and Traveller Pitches;
- * Affordable Housing; and,
- * The North East Norwich Strategic Allocation.

1.4. Representations have been made at every stage of the JCS process; and it is noted that this current consultation can only comment on soundness issues relating to the SoFC. We are mindful of this fact, but would like to remind the GNDP of our ongoing soundness concerns relating to the submitted JCS as set out in our previous representations at the Issues and Options Stage, the Preferred Option Stage and the two Counsel's Opinions.

1.5. In summary, we conclude that the SoFC does not represent an adequate attempt by the GNDP to address the matters of particular concern raised at the EM on 13th May 2010 and as set out in the 15 page Note (EIP 35) circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' (dated 24th May 2010). EIP 35 set out that there were 6 areas of concern on which the Inspectors considered that further work was needed. These related to:

- i) Infrastructure;
- ii) Affordable Housing;
- iii) Distribution of Development, particularly in relation to public transport opportunities;
- iv) Northern Distributor Road;
- v) Sustainability Issues; and
- vi) The North-East Growth Triangle.

1.6. It is therefore surprising that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 (EIP 36) to clarify and note the Inspectors' concerns and set out the GNDP's suggested way forward on a number of these matters.

1.7. Notwithstanding our concerns regarding the additional matters upon which the GNDP has chosen not to respond, we set out below our comments on the focused changes, namely, those in relation to affordable housing and the proposed strategic allocation at NE Norwich, and the SA addendum and AH Viability Study that support the SoFC. Even in respect of these matters, alone, we contend that the JCS remains unsound.

iii) Targets - Plan Wide and Site

2.5 Paragraph 29 of PPS3: Housing (June 2010) makes reference to two types of target: plan-wide and those to be applied to individual sites of qualifying size. In relation to the former we welcome the introduction of what we believe is a plan-wide target (33%), but we are concerned that it is rather hidden in the supporting text in para 5.28A of FC3. Accordingly, we believe there should be a clear policy statement as to what the Plan wide affordable housing target is.

2.6 A 33% target would imply that for the 18 year period, 11,860 of the required overall number of dwellings of 35,580 should be affordable. Whilst this might represent a reasonable target based on need alone, taking other factors into account could mean that a different target is more appropriate.

iv) Housing Need Assessment

2.7 We are concerned that the most recent housing needs assessment being relied upon is based on primary data collected in 2005/2006. Moreover, the Central Government guidance on the preparation of such assessments has changed, more than once, since that time.

Statement of Focussed Changes (Joint Core Strategy)

O - 12227 - 8809 - FC3 changes to paragraph 5.28 - i, ii, iii

12227 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

2.8 Paragraph 5.28B of FC3 identifies that the most recent housing assessment for the three districts indicates that 43% of overall housing need ('requirement' would be a more accurate word) can only be met by affordable housing. However, this is not an adequate reflection of the housing need for each Local Authority. PPS3 stresses (paragraph 29) that LPAs should aim to ensure that provision of affordable housing meets the needs of both current and future occupiers, taking into account information from the SHMA. By way of example, the GNHMA09 updates the 2006 figures indicating a slight increase in the net requirement for affordable housing in South Norfolk to 136 dwellings p.a. or 26%. In essence, this indicates that in South Norfolk a reasonable need-based target area-wide requirement for affordable housing remains broadly about 25% of all new dwellings provided to meet locally generated needs i.e. in line with the current local plan policy.

2.9 The ORS Housing Need and Stock Condition (2006) is the housing market assessment for the GN sub region with surveys carried out in 2005-2006. This was based on the then guidance 'Local Housing Needs Assessment: A Guide to Good Practice' (2000). The SHMA was carried out in 2007, and reflected the new SHMA Practice Guidance in March 2007. The SHMA Practice Guidance Version 2 (2007) replaced the DETR and ODPM good practice guidance and manual published in 2000 and 2004 respectively, upon which the ORS assessment was based. However, the SHMA states that 'we rely on the ORS Housing Need and Stock Condition Study of 2006'. But it is unclear if the calculations of the figures from the 2006 Assessment reflected the requirements of the new guidance. The 2007 SHMA Guidance also advises that 'a partnership should not need to undertake comprehensive assessment exercise more frequently than every five years although they should be updated regularly'. The outworking of this advice is that the figures identified in the 2006 assessment (which was carried out between 2005 and 2006) will be due for a comprehensive re-assessment exercise, between 2010 and 2011, to ensure they are still applicable.

2.10 As a consequence the current wording of paragraph 5.28B is unsound for a number of reasons:

- * '...in the short term...' can only mean the period shortly after the assessment field work was carried out in 2005/06.
- * There can be no reliance today that 43% of overall housing need can only be met by affordable housing.
- * The proposed policy target on qualifying sites is no longer 40% in the focused changes, so this is confusing and misleading.

2.11 We welcome the principle of a list of factors which may mean that a target may not be reached. However, the claim that 40% is the maximum achievable in normal market conditions needs to be justified. We assert that this will only have been achieved in some limited cases in very good market conditions.

2.12 Moreover, we believe that there are two other factors which need to be added to this list:

- * '...the requirement for a site to meet other planning objectives, for example necessary infrastructure provision...' and
- * '...the lack of availability of public subsidy...'

2.13 It is unsound to quote the findings on tenure split from the outdated work of 2005/06. It certainly is not relevant to imply that this is the split to be sought in the 'short term', i.e. say 2010 to 2012.

2.14 We welcome the recognition that different parts of the GNDP area require different types of affordable housing (e.g. greatest need for social rented housing is in the Norwich Urban area). But to be consistent, the policy approach should be to set a target for affordable housing for each administrative area to take account of different levels of need.

2.15 We note the reference to a review of the 'overall policy target and balance of tenures' and we understand that a new SHMA is to be commissioned next year.

2.16 We assume that any changes to these fundamental parts of affordable housing policy will only be formally introduced as part of a Core Strategy update. This needs to be made clear as any interim changes will not be subjected to the same level of scrutiny or carry the same weight.

2.17 We do not agree with the definition of affordable housing in paragraph 5.28 of FC3. The inclusion of the phrase 'people in housing need' is too restrictive. PPS3 is concerned about providing housing for all those in need of affordable housing i.e. below market entry level. This is a wider group than those in housing need in the traditional sense; and the definition of affordable housing in Annex B of PPS3 reflects this wider ambit, when it states: "Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market ...".

vi) Annex 1

2.19 Annex 1 sets out how the overall affordable housing target for JCS was calculated. As discussed above, we note it bases its calculations on the 2005/06 Housing Needs Assessment. We understand that based on the delivery of 1,306 affordable units between 2005/06 and 2007/08 that there is a residual requirement of 11,878 from 2008 to 2026. However, we disagree that: 'The policy target is higher, because the Government's basic needs assessment model makes the assumption that any backlog at the time of the study is eliminated over the next five years. This therefore

Statement of Focussed Changes (Joint Core Strategy)

O - 12227 - 8809 - FC3 changes to paragraph 5.28 - i, ii, iii

12227 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

has the effect of increasing the affordable housing targets and in the particular the social rented element'.

2.20 Firstly, the overall shortfall in affordable housing in the housing needs assessment was calculated from adding the existing backlog at that time and the newly arising need, minus supply. This found 13,184 affordable housing units were required over the JCS plan period. Therefore, the 1,306 completed affordable units between 2005/06 to 2007/08 went towards reducing the overall affordable requirement.

2.21 Secondly, Table 2.0 breaks down the Affordable Housing Requirement for 2009-2026. This is based on the 2006 HNA and affordable housing completions between 2005/06 to 2008/09. Any of the original backlog remaining is still included in the total affordable housing requirement for 2009/10 to 2025/26. When looking at this as a percentage of total housing requirements, the required affordable housing is 33% for the whole GNDP area and therefore 40% is not justified by the evidence base.

Table 2.0 Affordable Housing Requirement for 2009-2026

Affordable Housing Requirement:
2006 - 2026
Backlog (ORS 05/06) 1,403
Newly arising need 2005/06-2025/2026 (21 x 561) (ORS 05/06) 11,781
Total 13,184
Minus Completions 2005/06 - 07/08 1,306
Total AH Requirement 08/09 - 25/26 (18 years) 11,878
Minus Completions 2008/09 697
Total AH Requirement 09/10 - 25/26 (17 years) 11,181
Overall Housing Requirement 2008-2026 (set out in JCS) 35,660
Minus Completions 2008/09 1,745
Total housing Requirement 2009-2026 (17 years) 33,915
Percentage AH Requirement of Total Housing Requirement (11,181 / 33,915) x 100 = 33%

2.22 The figure in the SoFC covers the period from 2008-2026 and does not take into account the completions from 2008/09. After looking at the available sites in the GN area, we have identified a potential 67 affordable units to be provided from sites of developments between 5 and 15 units. This was calculated from the list of potential sites provided in the SHLAA. Table 2.1 outlines that considering affordable housing commitments and completions to date, along with potential delivery from 5-15 unit sites, there is a remaining requirement of 7,385 affordable units from 2009-2026, to be sought from sites of 16+ units.

Table 2.1 Remaining Requirement of Affordable Units 2009 -2026

Total AH Requirement identified in Focussed Changes 11,860
Minus Existing Commitments 2008 (identified in Annex 1 of Focussed Changes) 3,711
Minus AH Completed 2008/09 697
Minus Potential supply 5-15 unit schemes 67
Remaining Requirement 7,385

5.1 Our view of the soundness of the JCS is well documented in previous representations and engagement at the EM on 13th May 2010. It is still clear that the matters of Affordable Housing and the Strategic Allocation remain unsound. There is no doubt that the short consultation on these issues has not repaired the position as outlined by the Inspectors. The real problem is that with a front loaded plan which has been developed over a number of years, it is impossible to play catch up on such significant issues.

5.2 The SoFC fails to address all the outstanding issues as set out by the Inspectors and has attempted to retro-fit the Sustainability Appraisal and JCS to suit the inclusion of the 'Strategic Allocation' and justification for the current level of Affordable Housing.

5.3 The JCS continues to be unsound, and the GNDP have failed to adequately consult on the SA or undertaken the very basic necessity of scoping correctly to allow an updated SA to be undertaken.

Statement of Focussed Changes (Joint Core Strategy)

O - 12248 - 1823 - FC3 changes to paragraph 5.28 - None

12248 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

1. Broadland District Council already has a policy which modifies PPS3 from a threshold of 15 to 5. It is submitted that continuing this will be a strong disincentive to providing variety in the nature of developments and should not be incorporated.
2. The numbers of Affordable Houses is based upon housing need but there is a lack of transparency on the criteria set by the Housing Associations, the entitlements and geographic spread of applicants.

Statement of Focussed Changes (Joint Core Strategy)

O - 12255 - 8047 - FC3 changes to paragraph 5.28 - None

12255 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary:

1. Broadland District Council already has a policy which modifies PPS3 from a threshold of 15 to 5. It is submitted that continuing this will be a strong disincentive to providing variety in the nature of developments and should not be incorporated.

3. The numbers of Affordable houses is based upon housing need but there is a lack of transparency on the criteria set by the Housing Associations, the entitlements and geographic spread of applicants.

The Localism Bill will introduce measures to shift power back into the hands of individuals, communities and councils and give local communities a real share in growth. We look forward to this change and in the meanwhile do not believe that the proposals contained in this consultation are compatible with the Governments objectives.

Statement of Focussed Changes (Joint Core Strategy)

O - 12278 - 8825 - FC3 changes to paragraph 5.28 - i

12278 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Hethersett Land Ltd (Hethersett Consortium) (Mr John Long) [8825] **Agent:** N/A

Full Text:

Summary:

Hethersett Land Ltd suggest that the proposed focussed change to Paragraph 5.28 (FC3) fails the justified test because it is not based on robust and credible evidence.

Hethersett Land Ltd questions the suggestion in paragraph 5.28b that local experience would suggest that 40% is the maximum achievable on sites without subsidy in normal market conditions. Hethersett Land Ltd requests that the evidence is made available at the Examination to demonstrate the number of instances where 40% affordable housing has been achieved without subsidy; the type and size of scheme proposed; the tenure split achieved; the definition of what constitutes a "normal" market as opposed to a "buoyant or any other type of market. Hethersett Land Ltd suggest that for the JCS to include such an assertion, more evidence is required to demonstrate that it was achieved in a significant number of instances on sites of varying size, reflecting the size of site likely to come forward over the plan period. Hethersett Land Ltd suggest that unless the GNDP can properly demonstrate a significant number of schemes where 40% affordable housing has been delivered without public subsidy and it can be demonstrated that this was in a prevailing "normal" market condition, the sentence should be removed.

Statement of Focussed Changes (Joint Core Strategy)

O - 12280 - 8826 - FC3 changes to paragraph 5.28 - None

12280 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Taylor Wimpey Developments & Hopkins Homes
(Mr John Holden) [8826] **Agent:** N/A

Full Text:

Summary: FC3 refers to "the policy target of 40% affordable housing on qualifying sites." For the avoidance of doubt, revised paragraph 5.28B should make it clear that the level of affordable housing achieved in any one location will be based upon the approach described in FC1. Paragraph 5.28B notes that the policy target and balance of tenures "will be kept under review in the light of updated information on housing need." FC1 indicates that the provision to be achieved in specific locations will be based upon a full evaluation of viability, not merely an investigation of information regarding housing need.

Statement of Focussed Changes (Joint Core Strategy)

O - 12283 - 8828 - FC3 changes to paragraph 5.28 - None

12283 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: The Leeder Family (Mr John Holden) [8828]

Agent: N/A

Full Text:

Summary:

FC3 refers to "the policy target of 40% affordable housing on qualifying sites." For the avoidance of doubt, revised paragraph 5.288 should make it clear that the level of affordable housing achieved in anyone location will be based upon the approach described in FC1. Paragraph 5.288 notes that the policy target and balance of tenures "will be kept under review in the light of updated information on housing need." FC1 indicates that the provision to be achieved in specific locations will be based upon a full evaluation of viability, not merely an investigation of information regarding housing need.

Statement of Focussed Changes (Joint Core Strategy)

O - 12289 - 8834 - FC3 changes to paragraph 5.28 - None

12289 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Trustees of the Gurloque Settlement, Norwich
Consolidated Charities, teh Great Hospital,
Norwich and of Anguish's Educational Foundation
(Mr John Holden) [8834]

Agent: Pegasus Planning Group (Mr John Holden) [4250]

Full Text:

Summary: FC3 refers to "the policy target of 40% affordable housing on qualifying sites." For the avoidance of doubt, revised paragraph 5.28B should make it clear that the level of affordable housing achieved in anyone location will be based upon the approach described in FC1. Paragraph 5.28B notes that the policy target and balance of tenures "will be kept under review in the light of updated information on housing need." FC1 indicates that the provision to be achieved in specific locations will be based upon a full evaluation of viability , not merely an investigation of information regarding housing need.

Statement of Focussed Changes (Joint Core Strategy)

O - 12295 - 8589 - FC3 changes to paragraph 5.28 - i, ii, iii

12295 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589] **Agent:** N/A

Full Text:

Summary:

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It has yet to be considered by the GNDDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

Policy FC3 Affordable Housing

This policy is not soundly based and an objection is lodged, because,

1. Broadland District Council already has a policy which modifies PPS3 from a threshold of 15 to 5. It is submitted that, given the context in which this is being proposed, continuing this practice will be a strong disincentive to providing variety in the nature of housing developments and should not be incorporated or modified.
2. The numbers of Affordable houses are based upon housing need but there is a lack of transparency on these numbers. The Housing Associations agree the criteria, the entitlements and geographic spread of applicants. These are available. However, the criteria vary depending upon the nature of the development. Its application is therefore subjective. The figures are based just on the numbers on housing registers but not all families meet the criteria to be considered for housing allocation. There is a serious possibility that this policy will be counter-productive and actually generate new affordable housing demand.
3. Broadland District Council has a good record for meeting the needs of their constituents in housing need. So the housing demand is being generated from within the District. It seems quite unreasonable for this to result in such a huge concentration of development in one location. This is especially so when it appears that the extent of development is driven mostly by the commitment to provide affordable houses.

Statement of Focussed Changes (Joint Core Strategy)

O - 12320 - 6993 - FC3 changes to paragraph 5.28 - ii

12320 Object

Focussed changes to Policy 4

FC3 changes to paragraph 5.28

Respondent: Thorpe and Felthorpe Trust [6993]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text:

Summary:

The GNDP's Affordable Housing Viability Study (July 2010) stated that the approach to testing viability is that a residual land value must be sufficiently greater than the Existing Use Value (or alternative use value) of a site. The assessment then includes a comprehensive set of residual land value calculations based upon averages of both land values and costs and then makes a broad assumption that development land viability would then be assessed by whether or not the resultant value for the land exceeds existing land value. Deliverability of housing growth is a key objective of the Core Strategy. Development of this complexity and nature may have to adopt complex funding approaches involving longer term infrastructure investment - a simplistic formula to fund affordable housing should be resisted. In any case, landowners will not bring forward land if it merely results in exceeding the existing land value. In reality, a developer will only bring forward land if the grant of planning permission creates a uplift in value that is considered to deliver a reasonable profit once sunk capital, planning requirements, risk and capital taxation have been taken into account. The three dragons viability model commonly used in London assumes a developer profit of 15%. (NB that schemes within London are likely to be served by an existing infrastructure framework which is a quite different development context to the creation of a sustainable urban extension). Clearly, if time frames are longer and development schemes require a more complex infrastructure approach a higher developer profit should be assumed. It is also noted that the Affordable Housing Viability Study (July 2010) attempts to benchmark what is considered to be a reasonable uplift in value to provide the necessary incentive for landowners to bring forward their land. However, it is considered that it is not been adequately demonstrated that the benchmarks adopted in the assessment have successfully provided this incentive across a range of sites within the area. Return is related to risk and this is a complex and therefore inherently more risky project for the developer. As has been clearly evidenced over the last four years. In addition, existing use values vary from site to site due to differing characteristics including use, condition of the site, specific market characteristics, tenant arrangements etc. As such, what is considered to be a reasonable uplift in value on one site may not be the case for other sites. The TFT therefore question the evidence base that supports the affordable housing policy. It is considered that the way the policy is currently worded will potentially deter developers/land owners from bringing land forward, which will in turn be detrimental to effectiveness of the Joint Core Strategy. As such, it is considered that it may be more appropriate to include detailed affordable housing requirements, with regard to quantum sought and thresholds, within the related development management policies that will emerge from each of the constituent local planning authorities that comprise the GNDP.

Statement of Focussed Changes (Joint Core Strategy)

O - 12078 - 8310 - FC4 paragraph 5.30 - i, ii, iii

12078 Object

Focussed changes to Policy 4

FC4 paragraph 5.30

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [none supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12109 - 8309 - FC4 paragraph 5.30 - i, ii, iii

12109 Object

Focussed changes to Policy 4

FC4 paragraph 5.30

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12229 - 8809 - FC4 paragraph 5.30 - i, ii, iii

12229 Object

Focussed changes to Policy 4

FC4 paragraph 5.30

Respondent: Landstock Estates Ltd & Landowners Group [8809] **Agent:** Barton Willmore (Mr Andrew Wilford) [8811]

Full Text:

Summary:

1.1. These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group in response to the Greater Norwich Development Partnerships (GNDP) consultation on its 'Statement of Focussed Changes' (SoFC). It is our understanding that the SoFC has been specifically published to address what the GNDP considers are those issues that require further changes following the articulation by the Inspectors' of their concerns over the submitted Joint Core Strategy (JCS) before, during and after the Exploratory Meeting (EM) held on 13th May 2010.

1.2. The SoFC has been accompanied by two supporting documents, namely, a Sustainability Appraisal Report (July 2010) (SA) prepared by Scott Wilson and an Affordable Housing (AH) Viability Study (July 2010) prepared by Drivers Jonas Deloitte.

1.3. The SoFC only relates to 3 elements of the JCS. These are:

- * Provision of Gypsy and Traveller Pitches;
- * Affordable Housing; and,
- * The North East Norwich Strategic Allocation.

1.4. Representations have been made at every stage of the JCS process; and it is noted that this current consultation can only comment on soundness issues relating to the SoFC. We are mindful of this fact, but would like to remind the GNDP of our ongoing soundness concerns relating to the submitted JCS as set out in our previous representations at the Issues and Options Stage, the Preferred Option Stage and the two Counsel's Opinions.

1.5. In summary, we conclude that the SoFC does not represent an adequate attempt by the GNDP to address the matters of particular concern raised at the EM on 13th May 2010 and as set out in the 15 page Note (EIP 35) circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' (dated 24th May 2010). EIP 35 set out that there were 6 areas of concern on which the Inspectors considered that further work was needed. These related to:

- i) Infrastructure;
- ii) Affordable Housing;
- iii) Distribution of Development, particularly in relation to public transport opportunities;
- iv) Northern Distributor Road;
- v) Sustainability Issues; and
- vi) The North-East Growth Triangle.

1.6. It is therefore surprising that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 (EIP 36) to clarify and note the Inspectors' concerns and set out the GNDP's suggested way forward on a number of these matters.

1.7. Notwithstanding our concerns regarding the additional matters upon which the GNDP has chosen not to respond, we set out below our comments on the focused changes, namely, those in relation to affordable housing and the proposed strategic allocation at NE Norwich, and the SA addendum and AH Viability Study that support the SoFC. Even in respect of these matters, alone, we contend that the JCS remains unsound.

v) FC4

2.18 We note the figure of 1,170 affordable homes on rural exception sites indicated for the 18 year period. Whilst as 'exceptions' these should not be part of the housing requirement, their provision upon completion should be counted as part of the affordable housing delivery for monitoring purposes.

vi) Annex 1

2.19 Annex 1 sets out how the overall affordable housing target for JCS was calculated. As discussed above, we note it bases its calculations on the 2005/06 Housing Needs Assessment. We understand that based on the delivery of 1,306 affordable units between 2005/06 and 2007/08 that there is a residual requirement of 11,878 from 2008 to 2026. However, we disagree that: 'The policy target is higher, because the Government's basic needs assessment model makes the assumption that any backlog at the time of the study is eliminated over the next five years. This therefore has the effect of increasing the affordable housing targets and in the particular the social rented element'.

2.20 Firstly, the overall shortfall in affordable housing in the housing needs assessment was calculated from adding the existing backlog at that time and the newly arising need, minus supply. This found 13,184 affordable housing units were required over the JCS plan period. Therefore, the 1,306 completed affordable units between 2005/06 to 2007/08 went towards reducing the overall affordable requirement.

Statement of Focussed Changes (Joint Core Strategy)

O - 12229 - 8809 - FC4 paragraph 5.30 - i, ii, iii

12229 Object

Focussed changes to Policy 4

FC4 paragraph 5.30

2.21 Secondly, Table 2.0 breaks down the Affordable Housing Requirement for 2009-2026. This is based on the 2006 HNA and affordable housing completions between 2005/06 to 2008/09. Any of the original backlog remaining is still included in the total affordable housing requirement for 2009/10 to 2025/26. When looking at this as a percentage of total housing requirements, the required affordable housing is 33% for the whole GNDP area and therefore 40% is not justified by the evidence base.

Table 2.0 Affordable Housing Requirement for 2009-2026

Affordable Housing Requirement:

2006 - 2026

Backlog (ORS 05/06) 1,403

Newly arising need 2005/06-2025/2026 (21 x 561) (ORS 05/06) 11,781

Total 13,184

Minus Completions 2005/06 - 07/08 1,306

Total AH Requirement 08/09 - 25/26 (18 years) 11,878

Minus Completions 2008/09 697

Total AH Requirement 09/10 - 25/26 (17 years) 11,181

Overall Housing Requirement 2008-2026 (set out in JCS) 35,660

Minus Completions 2008/09 1,745

Total housing Requirement 2009-2026 (17 years) 33,915

Percentage AH Requirement of Total Housing Requirement

$(11,181 / 33,915) \times 100 = 33\%$

2.22 The figure in the SoFC covers the period from 2008-2026 and does not take into account the completions from 2008/09. After looking at the available sites in the GN area, we have identified a potential 67 affordable units to be provided from sites of developments between 5 and 15 units. This was calculated from the list of potential sites provided in the SHLAA. Table 2.1 outlines that considering affordable housing commitments and completions to date, along with potential delivery from 5-15 unit sites, there is a remaining requirement of 7,385 affordable units from 2009-2026, to be sought from sites of 16+ units.

Table 2.1 Remaining Requirement of Affordable Units 2009 -2026

Total AH Requirement identified in Focussed Changes 11,860

Minus Existing Commitments 2008 (identified in Annex 1 of Focussed Changes) 3,711

Minus AH Completed 2008/09 697

Minus Potential supply 5-15 unit schemes 67

Remaining Requirement 7,385

5.1 Our view of the soundness of the JCS is well documented in previous representations and engagement at the EM on 13th May 2010. It is still clear that the matters of Affordable Housing and the Strategic Allocation remain unsound. There is no doubt that the short consultation on these issues has not repaired the position as outlined by the Inspectors. The real problem is that with a front loaded plan which has been developed over a number of years, it is impossible to play catch up on such significant issues.

5.2 The SoFC fails to address all the outstanding issues as set out by the Inspectors and has attempted to retro-fit the Sustainability Appraisal and JCS to suit the inclusion of the 'Strategic Allocation' and justification for the current level of Affordable Housing.

5.3 The JCS continues to be unsound, and the GNDP have failed to adequately consult on the SA or undertaken the very basic necessity of scoping correctly to allow an updated SA to be undertaken.

Statement of Focussed Changes (Joint Core Strategy)

O - 11746 - 7224 - FC5 Gypsy & Travellers - None

11746 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Friends Family and Travellers (Planning) (Mr S J Staines) [7224] **Agent:** N/A

Full Text:

Summary: Friends, Families and Travellers and Traveller Law Reform Project response to Joint Core Strategy for Broadland, Norwich and South Norfolk Core Strategy Focussed Changes Consultation

FC 5 and FC 7

The key changes here relates to plans for provision of Gypsy and Traveller sites beyond 2011. The Government intends to abolish the Regional Spatial Strategy but expects needs to be met through locally supported targets.

The EiP of the partial review examined evidence as to need throughout the region and as such still forms an important part of the evidence base in assessing need. The Temporary Consultancy Advice carried out for EERA by Pat Niner of University of Birmingham forms part of the evidence base. It criticised the Norfolk GTAA for not following the spirit of government guidance in carrying out GTAA's and also for not assessing likely future family increase. The councils accept the assessments to 2011 in Policy H3 of the RSS. The policy assessed needs beyond 2011 on the basis of a compound 3% per annum growth rate based on all available evidence about family formation rates. This growth rate has been accepted and used by all the regions which have completed their policy revisions for Gypsy and Traveller accommodation. We can see no reason why this growth rate which applied to pitch provision in 2011 gives longer term targets has effectively been rejected by the councils. Such future needs arise solely from local family formation. In our view the 3% compound growth rate is the best available measure at the moment on which to base need and should be adhered to until such time as more reliable information may become available. Failure to do this will inevitably mean that planning for the near future for much needed sites will be unnecessarily delayed. We are concerned that beyond indicating provision beyond 2011 will be based on updated local evidence of need the policy does not state how and when such an updating will be carried out. The policy and accompanying text should state how and when such updating will be carried out and indicate how provision will be made post 2011.

The above comments apply equally to transit need. The EiP clearly established that there was a need for transit provision and this evidence surely still stands.

Statement of Focussed Changes (Joint Core Strategy)

O - 12088 - 8310 - FC5 Gypsy & Travellers - i, ii, iii

12088 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [not supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12103 - 8309 - FC5 Gypsy & Travellers - i, ii, iii

12103 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12174 - 1781 - FC5 Gypsy & Travellers - None

12174 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

The Council objects to this policy for the following reasons.

1. The changes proposed to this policy expunge the number of sites to be provided as required by the Regional Spatial Strategy but Councils are bound by legislation to make provisions. There is no indication for example that the number of permanent residential sites will be substantially different from that given in the previous version; merely that they choose not to define it. If it is to be fewer then the policy should say so.
2. The suggestion that these will be reassessed in 2011 is of concern. The policy is already redundant but no alternative is put forward, except that it will apparently be updated upon local evidence of need; an expression is lacks clarity.
3. The continued use of the reference to local research showing that it meets the needs of the G&T communities is inadequate. This policy would fail to safeguard the local settled community.
4. After 2011 pitches will be provided in association with large scale housing growth. This suggests that our area will be subject to added pressure to facilitate gypsy sites on top of the already severe social and environmental pressures, which will arise out of the housing growth.
5. The fact that these groups largely ignore normal planning constraints should place an onus on councils to do more to manage and not just concede additional development. There is no evidence that this is recognised.

Statement of Focussed Changes (Joint Core Strategy)

O - 12219 - 8808 - FC5 Gypsy & Travellers - ii

12219 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Mr Clifford Legett [8808]

Agent: N/A

Full Text:

Summary:

Given the identified difficulties in delivering the required affordable housing. Why has Mobile Home provision only been considered for meeting the needs of the Traveller community.

Many older people chose to live on Mobile Home parks that ban Children. People whose job or lifestyle involves significant time away from home chose a Park Home for security.

There are several sites in the UK that cater for Natureists. Nude sunbathing is common on the secluded beaches of Norfolk, and this facility attracts many professional people to the Norwich area. Why not a Naturist village discretely placed

in the development triangle.

The Centre for Alternative Technology has pioneered low environmental impact housing where carbon footprint is reduced via dispensing with foundations. Why not allow experimental construction methods.

With housing one size does not fit all. Given the uncertain economic future, it is inevitable that homes will be built in the wrong place. The flexibility offered by mobile home provision is one way of overcoming this limitation.

I recommend that 75% of mobile home provision not be intended for travellers.

Statement of Focussed Changes (Joint Core Strategy)

O - 12249 - 1823 - FC5 Gypsy & Travellers - None

12249 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

The Council objects to this policy for the following reasons.

1. The changes proposed to this policy expunge the number of sites to be provided as required by the Regional Spatial Strategy but Councils are bound by legislation to make provisions. There is no indication for example that the number of permanent residential sites will be substantially different from that given in the previous version; merely that they choose not to define it. If it is to be fewer then the policy should say so.
2. The suggestion that these will be reassessed in 2011 is of concern. The policy is already redundant but no alternative is put forward, except that it will apparently be updated upon evidence of local need; an expression which lacks definition.
3. The continued use of the reference to local research showing that it meets the needs of the G&T communities is inadequate. This policy would fail to safeguard the local settled community.
4. After 2011 pitches will be provided in association with large scale housing growth. This suggests that our area will be subject to added pressure to facilitate gypsy sites on top of the already severe social and environmental pressures which will arise out of the housing growth.
5. The fact that these groups largely ignore normal planning constraints should place an onus on councils to do more to manage and not just concede additional development. There is no evidence that this is recognised.

Statement of Focussed Changes (Joint Core Strategy)

O - 12256 - 8047 - FC5 Gypsy & Travellers - None

12256 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary:

The Council objects to this policy for the following reasons.

1. The changes proposed to this policy expunge the number of sites to be provided as required by the Regional Spatial Strategy but Councils are bound by legislation to make provisions. There is no indication for example that the number of permanent residential sites will be substantially different from that given in the previous version; merely that they choose not to define it. If it is to be fewer then the policy should say so.
2. The suggestion that these will be reassessed in 2011 is of concern. The policy is already redundant but no alternative is put forward, except that it will apparently be updated upon local evidence of need; an expression is lacks clarity.
3. The continued use of the reference to local research showing that it meets the needs of the G&T communities is inadequate. This policy would fail to safeguard the local settled community.
4. After 2011 pitches will be provided in association with large scale housing growth. This suggests that our area will be subject to added pressure to facilitate gypsy sites on top of the already severe social and environmental pressures, which will arise out of the housing growth.
5. The fact that these groups largely ignore normal planning constraints should place an onus on councils to do more to manage and not just concede additional development. There is no evidence that this is recognised.

Statement of Focussed Changes (Joint Core Strategy)

O - 12296 - 8589 - FC5 Gypsy & Travellers - i, ii, iii

12296 Object

Focussed changes to Policy 4

FC5 Gypsy & Travellers

Respondent: SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589] **Agent:** N/A

Full Text:

Summary:

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It has yet to be considered by the GNDDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

Policy FC5 Gypsies and Travellers

This policy is unsound and for the following reasons.

1. The number of sites will be reassessed in 2011 on a new basis. This concedes that the policy is already redundant and yet no adequate alternative is put forward. It is apparently to be updated upon local evidence of need; an expression which lacks clarity.
2. Although Councils are bound by legislation to make provisions for these sites, the changes proposed to this policy expunge the number of sites formerly dictated by the Regional Spatial Strategy. As a consequence, there is now no indication that the number of permanent residential sites will be substantially different from that given in the previous version; merely that they choose not to define it. If it is to be fewer then the policy should say so.
3. The continued use of the reference to local research, showing that it meets the needs of the Gypsy and Traveller communities, is inadequate. Such a policy would fail to safeguard the local settled community.
4. After 2011 pitches will be provided in association with large scale housing growth. Thus the Growth Triangle will be subject to added pressure to facilitate gypsy sites on top of the already severe social and environmental pressures, which will arise out of the housing plans.
5. There is considerable evidence that these itinerant groups frequently ignore normal planning constraints. This should place an onus on councils to do more to control and not just concede additional development. There is no evidence that this has been recognised.

Statement of Focussed Changes (Joint Core Strategy)

O - 12085 - 8310 - FC6 paragraph 5.32 - i, ii, iii

12085 Object

Focussed changes to Policy 4

FC6 paragraph 5.32

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [not supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12106 - 8309 - FC6 paragraph 5.32 - i, ii, iii

12106 Object

Focussed changes to Policy 4

FC6 paragraph 5.32

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 11750 - 7224 - FC7 Paragraph 5.36 - None

11750 Object

Focussed changes to Policy 4

FC7 Paragraph 5.36

Respondent: Friends Family and Travellers (Planning) (Mr S J Staines) [7224] **Agent:** N/A

Full Text:

Summary: Friends, Families and Travellers and Traveller Law Reform Project response to Joint Core Strategy for Broadland, Norwich and South Norfolk Core Strategy Focussed Changes Consultation

FC 5 and FC 7

The key changes here relates to plans for provision of Gypsy and Traveller sites beyond 2011. The Government intends to abolish the Regional Spatial Strategy but expects needs to be met through locally supported targets.

The EiP of the partial review examined evidence as to need throughout the region and as such still forms an important part of the evidence base in assessing need. The Temporary Consultancy Advice carried out for EERA by Pat Niner of University of Birmingham forms part of the evidence base. It criticised the Norfolk GTAA for not following the spirit of government guidance in carrying out GTAA's and also for not assessing likely future family increase. The councils accept the assessments to 2011 in Policy H3 of the RSS. The policy assessed needs beyond 2011 on the basis of a compound 3% per annum growth rate based on all available evidence about family formation rates. This growth rate has been accepted and used by all the regions which have completed their policy revisions for Gypsy and Traveller accommodation. We can see no reason why this growth rate which applied to pitch provision in 2011 gives longer term targets has effectively been rejected by the councils. Such future needs arise solely from local family formation. In our view the 3% compound growth rate is the best available measure at the moment on which to base need and should be adhered to until such time as more reliable information may become available. Failure to do this will inevitably mean that planning for the near future for much needed sites will be unnecessarily delayed. We are concerned that beyond indicating provision beyond 2011 will be based on updated local evidence of need the policy does not state how and when such an updating will be carried out. The policy and accompanying text should state how and when such updating will be carried out and indicate how provision will be made post 2011.

The above comments apply equally to transit need. The EiP clearly established that there was a need for transit provision and this evidence surely still stands.

Statement of Focussed Changes (Joint Core Strategy)

O - 12079 - 8310 - FC7 Parapgraph 5.36 - i, ii, iii

12079 Object

Focussed changes to Policy 4

FC7 Parapgraph 5.36

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [none supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12110 - 8309 - FC7 Paragraph 5.36 - i, ii, iii

12110 Object

Focussed changes to Policy 4

FC7 Paragraph 5.36

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 11740 - 8606 - FC8 - i, ii, iii

11740 Object

Focussed changes Policy 10

FC8

Respondent: Sara Beaven [8606]

Agent: N/A

Full Text:

I do not believe that the North East of Norwich should have the growth triangle status. There was not consultation to ask if residents wanted growth point status and there is no mandate for the council to presume they represent the residents views. Growth should be located to the south of Norwich where transport links are good and employment opportunities exist. The NDR funding is not guaranteed and the North East of Norwich cannot support this level of growth.

Summary:

I do not believe that the North East of Norwich should have the growth triangle status. There was not consultation to ask if residents wanted growth point status and there is no mandate for the council to presume they represent the residents views. Growth should be located to the south of Norwich where transport links are good and employment opportunities exist. The NDR funding is not guaranteed and the North East of Norwich cannot support this level of growth.

Statement of Focussed Changes (Joint Core Strategy)

S - 11749 - 8668 - FC8 - None

11749 Support

Focussed changes Policy 10

FC8

Respondent: National Grid (Bethany Tucker) [8668]

Agent: N/A

Full Text:

Summary:

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties

http://www.nationalgrid.com/NR/ronlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf

- Gas Transmission Underground Pipelines - Guidance

http://www.nationalgrid.com/NR/ronlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance_2_.pdf

Statement of Focussed Changes (Joint Core Strategy)

O - 11756 - 8670 - FC8 - None

11756 Object

Focussed changes Policy 10

FC8

Respondent: Dr Lorraine Maitland [8670]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11759 - 8672 - FC8 - None

11759 Object

Focussed changes Policy 10

FC8

Respondent: Mr Peter Moy [8672]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road , Salhouse Road and Plumstead Road East - non of which are suitable for widening within the 'built-up area'.

Statement of Focussed Changes (Joint Core Strategy)

O - 11762 - 8673 - FC8 - None

11762 Object

Focussed changes Policy 10

FC8

Respondent: Mr Ian Muller [8673]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11765 - 8674 - FC8 - None

11765 Object

Focussed changes Policy 10

FC8

Respondent: Carl & Diana Wainwright [8674]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11768 - 8675 - FC8 - None

11768 Object

Focussed changes Policy 10

FC8

Respondent: Nichola Cable & Aaron Joyce [8675]

Agent: N/A

Full Text:

Summary: We wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area.
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement.

Please register us both as objectors. In our view the Focused Changes are unsound for the following reasons: -

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage, with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. We are concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5, such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. We are concerned that the proposed number of new houses cannot be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed for development OR the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this very important issue.
4. We object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as a considerable loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11771 - 8676 - FC8 - None

11771 Object

Focussed changes Policy 10

FC8

Respondent: C Hipperson [8676]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11776 - 8677 - FC8 - None

11776 Object

Focussed changes Policy 10

FC8

Respondent: R Newton [8677]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11779 - 8678 - FC8 - None

11779 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs R C Burton [8678]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11782 - 8679 - FC8 - None

11782 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs P W Dade [8679]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11785 - 8680 - FC8 - None

11785 Object

Focussed changes Policy 10

FC8

Respondent: John Tink and Janet Mann [8680]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11788 - 8681 - FC8 - None

11788 Object

Focussed changes Policy 10

FC8

Respondent: Mrs and Mr Julie and Simon Hunt [8681]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11791 - 8682 - FC8 - None

11791 Object

Focussed changes Policy 10

FC8

Respondent: Marie Smithson [8682]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11794 - 8683 - FC8 - None

11794 Object

Focussed changes Policy 10

FC8

Respondent: Ray, Olive and Simon Halliday [8683]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11797 - 8684 - FC8 - None

11797 Object

Focussed changes Policy 10

FC8

Respondent: Mrs E Wickham [8684]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11798 - 8684 - FC8 - None

11798 Object

Focussed changes Policy 10

FC8

Respondent: Mrs E Wickham [8684]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11801 - 8685 - FC8 - None

11801 Object

Focussed changes Policy 10

FC8

Respondent: Joan Middleton [8685]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11804 - 8686 - FC8 - None

11804 Object

Focussed changes Policy 10

FC8

Respondent: Mrs P Hardie [8686]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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We need to be far more self sufficient in food production, therefore NO development on our farmland.

Statement of Focussed Changes (Joint Core Strategy)

O - 11809 - 8688 - FC8 - None

11809 Object

Focussed changes Policy 10

FC8

Respondent: Mr Clive Keable [8688]

Agent: N/A

Full Text:

Summary:

Policy 10 - FC8 & 9

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11821 - 8693 - FC8 - None

11821 Object

Focussed changes Policy 10

FC8

Respondent: John & Janice Waters [8693]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11828 - 8694 - FC8 - None

11828 Object

Focussed changes Policy 10

FC8

Respondent: F Jeans [8694]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11832 - 8695 - FC8 - None

11832 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs R Munro [8695]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11835 - 8696 - FC8 - None

11835 Object

Focussed changes Policy 10

FC8

Respondent: Mr J Sims [8696]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

S - 11838 - 8697 - FC8 - None

11838 Support

Focussed changes Policy 10

FC8

Respondent: Barratt Strategic (Mr David Banfield) [8697]

Agent: CGMS Ltd (Mr Richard Atkinson) [7681]

Full Text:

Summary:

Statement of Focussed Changes (Joint Core Strategy)

O - 11840 - 8663 - FC8 - None

11840 Object

Focussed changes Policy 10

FC8

Respondent: Mr Arthur Self [8663]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11844 - 8698 - FC8 - None

11844 Object

Focussed changes Policy 10

FC8

Respondent: Jean Wills [8698]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11848 - 8699 - FC8 - None

11848 Object

Focussed changes Policy 10

FC8

Respondent: Mr Colin Wills [8699]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11851 - 6618 - FC8 - None

11851 Object

Focussed changes Policy 10

FC8

Respondent: Mr R.S. Lindsay [6618]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11854 - 8700 - FC8 - None

11854 Object

Focussed changes Policy 10

FC8

Respondent: C Drake [8700]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11858 - 8701 - FC8 - None

11858 Object

Focussed changes Policy 10

FC8

Respondent: Mr B Morgan [8701]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11861 - 8702 - FC8 - None

11861 Object

Focussed changes Policy 10

FC8

Respondent: Miss K Morgan [8702]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11864 - 8703 - FC8 - None

11864 Object

Focussed changes Policy 10

FC8

Respondent: J J Wyatt [8703]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11867 - 8704 - FC8 - None

11867 Object

Focussed changes Policy 10

FC8

Respondent: Mrs & Mrs B J Jones [8704]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11870 - 8705 - FC8 - None

11870 Object

Focussed changes Policy 10

FC8

Respondent: Mr M Wyatt [8705]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11873 - 8706 - FC8 - None

11873 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs C Harris [8706]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11879 - 8707 - FC8 - None

11879 Object

Focussed changes Policy 10

FC8

Respondent: J E P Watts [8707]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11882 - 8708 - FC8 - None

11882 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Ann Moy [8708]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

S - 11888 - 8710 - FC8 - None

11888 Support

Focussed changes Policy 10

FC8

Respondent: Blue Living (David Copeland) [8710]

Agent: N/A

Full Text: Makes sense in the light of earlier inspector comments.

Summary: Makes sense in the light of earlier inspector comments.

Statement of Focussed Changes (Joint Core Strategy)

O - 11890 - 8711 - FC8 - None

11890 Object

Focussed changes Policy 10

FC8

Respondent: Ellen Powley [8711]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road

Statement of Focussed Changes (Joint Core Strategy)

O - 11893 - 8712 - FC8 - None

11893 Object

Focussed changes Policy 10

FC8

Respondent: Lorna Beckett [8712]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11897 - 8713 - FC8 - None

11897 Object

Focussed changes Policy 10

FC8

Respondent: Mrs P Thorpe [8713]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11900 - 8714 - FC8 - None

11900 Object

Focussed changes Policy 10

FC8

Respondent: Mr R Thorpe [8714]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11903 - 8715 - FC8 - None

11903 Object

Focussed changes Policy 10

FC8

Respondent: Daniel Roper [8715]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11906 - 8716 - FC8 - None

11906 Object

Focussed changes Policy 10

FC8

Respondent: Wm. P S Watts [8716]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11909 - 8717 - FC8 - None

11909 Object

Focussed changes Policy 10

FC8

Respondent: Stuart Richards [8717]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11912 - 8718 - FC8 - None

11912 Object

Focussed changes Policy 10

FC8

Respondent: S M Smith [8718]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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Statement of Focussed Changes (Joint Core Strategy)

O - 11915 - 8719 - FC8 - None

11915 Object

Focussed changes Policy 10

FC8

Respondent: Mr J Rice [8719]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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Statement of Focussed Changes (Joint Core Strategy)

O - 11918 - 8513 - FC8 - None

11918 Object

Focussed changes Policy 10

FC8

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11921 - 8720 - FC8 - None

11921 Object

Focussed changes Policy 10

FC8

Respondent: Howard Wyatt [8720]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11924 - 8721 - FC8 - None

11924 Object

Focussed changes Policy 10

FC8

Respondent: Tania Lean [8721]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11927 - 8722 - FC8 - None

11927 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs R A Pointer [8722]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11930 - 8657 - FC8 - i, ii, iii

11930 Object

Focussed changes Policy 10

FC8

Respondent: Mr Geoff Lyon (MTCP MRTPI) [8657]

Agent: N/A

Full Text:

Summary: The proposed changes (FC8) are considered to be unsound for the following reasons:-

1. On 22 June 2010 Broadland District Council Cabinet considered that "following the election of the new Coalition Government there was uncertainty over a number of key policy areas including the growth agenda and therefore it seemed wise for the Council to take a step back and take stock until such time as the direction the new Government proposed to take became clear".
2. In light of the announced delays in relation to the Site Specific Proposals allocations by Broadland District Council, the proposed changes to FC8 are unjustified ahead of the full and proper consideration of the implications of change at National Policy level, particularly in respect of the growth agenda to meet the needs of the local community.
3. The proposed focused change unjustifiably and prematurely changes the status of the entire growth triangle area from one where development might be possible in principle in the future in certain locations and instead creates a single blanket site allocation for development without clearly stating whether such growth is deliverable, particularly in the light of potentially significant barriers to growth such as the uncertainty regarding the provision of the Northern Distributor Road (NDR) and other necessary infrastructure;
4. The proposal is inflexible in that it designates land in the growth triangle for potential development without first establishing whether such growth is deliverable or indeed represents the most appropriate strategy when considered against the reasonable alternatives, particularly in light of potential barriers to growth and the fact that there is no "Plan B";
5. The focused change is unsound because it will result in the entire growth triangle area falling within a newly created site allocation and result in an extended development boundary thus changing its status from predominantly one of restricted countryside designations to one where the principle of development would thereafter become acceptable;
6. Re-classifying the land in the manner proposed would open up all parts of the growth triangle to development ahead of Site Specific Allocations. This will put delivery of the key objectives of the Core Strategy at unnecessary risk as the area will be likely to be subject to piece-meal development proposals. This is likely to result in uncoordinated and poorly planned development coming forward ahead of a comprehensive masterplan being developed for the growth triangle area.
7. In summary, the proposed focus changes are neither justified, effective nor consistent with recent changes in national policy.

Statement of Focussed Changes (Joint Core Strategy)

S - 11934 - 8726 - FC8 - None

11934 Support

Focussed changes Policy 10

FC8

Respondent: Persimmon/Hopkins Homes/Taylor Wimpey [8726] **Agent:** Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: We welcome the change from a strategic direction of growth to a strategic allocation and believe that this will assist with simplifying the planning process and aide delivery.

Summary: We welcome the change from a strategic direction of growth to a strategic allocation and believe that this will assist with simplifying the planning process and aide delivery.

Statement of Focussed Changes (Joint Core Strategy)

O - 11940 - 8727 - FC8 - None

11940 Object

Focussed changes Policy 10

FC8

Respondent: Mr J Mayhew [8727]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 11943 - 8728 - FC8 - None

11943 Object

Focussed changes Policy 10

FC8

Respondent: Mrs L Mayhew [8728]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 11946 - 8729 - FC8 - None

11946 Object

Focussed changes Policy 10

FC8

Respondent: C Baxter [8729]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11949 - 8730 - FC8 - None

11949 Object

Focussed changes Policy 10

FC8

Respondent: Mrs I Baxter [8730]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 11952 - 8731 - FC8 - None

11952 Object

Focussed changes Policy 10

FC8

Respondent: G P Collins [8731]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11955 - 8732 - FC8 - None

11955 Object

Focussed changes Policy 10

FC8

Respondent: Mr D H Lean [8732]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11958 - 8733 - FC8 - None

11958 Object

Focussed changes Policy 10

FC8

Respondent: Lindsay Heard [8733]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11961 - 8734 - FC8 - None

11961 Object

Focussed changes Policy 10

FC8

Respondent: Mrs J Snelling [8734]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11965 - 8735 - FC8 - None

11965 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Daphne R Wyatt [8735]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11968 - 8736 - FC8 - None

11968 Object

Focussed changes Policy 10

FC8

Respondent: P Wyatt [8736]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11971 - 8737 - FC8 - None

11971 Object

Focussed changes Policy 10

FC8

Respondent: J B Granger [8737]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11974 - 8738 - FC8 - None

11974 Object

Focussed changes Policy 10

FC8

Respondent: Mrs C Granger [8738]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11977 - 8739 - FC8 - None

11977 Object

Focussed changes Policy 10

FC8

Respondent: Roy Durrant [8739]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11980 - 8740 - FC8 - None

11980 Object

Focussed changes Policy 10

FC8

Respondent: Neil Dobson [8740]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11984 - 8742 - FC8 - None

11984 Object

Focussed changes Policy 10

FC8

Respondent: B Copland [8742]

Agent: N/A

Full Text:

Summary:

I am responding to the GNDP public consultation on focussed changes to the Joint Core Strategy. I am doing so by letter because I feel your representation form for the consultation unduly restricts my freedom to respond. I find the consultation to be unsound because it is being held during the holiday period, and when many parish councils are not holding their meetings. I object to their proposals to reclassify the Old Catton, Sprowston, Rackheath and Thorpe St Andrews growth triangle as a strategic allocation rather than a strategic location. I object because that would, that future work could be progressed through a supplementary planning document instead of an area action plan. I object to that because a supplementary planning document would enable you to make any changes you wanted to the growth triangle plans over the next twenty years or so without further public consultation. I would like you to reply to my letter and to include it in the records of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 11985 - 8743 - FC8 - None

11985 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs G P Leach [8743]

Agent: N/A

Full Text:

Summary:

We are responding to the GNDP public consultation on focussed changes to the Joint Core Strategy. We are doing so by letter because we feel your representation form for the consultation unduly restricts our freedom to respond. We find the consultation to be unsound because it is being held during the holiday period when many parish councils are not holding meetings. We object to their proposed to reclassify the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle as a "strategic allocation" rather than a "strategic location". We object because that would mean that future work could be progressed through a supplementary planning document (SPD) instead of an area action plan (AAP). We object to that because an SPD would enable them to make any change they wanted to the growth triangle plans over the next twenty years or so without further public consultation. Would you please reply fully to our letter and to include it in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 11986 - 8744 - FC8 - None

11986 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Ellyatt [8744]

Agent: N/A

Full Text:

Summary:

This letter is in response to the GNDP public consultation on focussed changes to the Joint Core Strategy and we are doing so by letter instead of via your website because we feel your representation form for the consultation unduly restricts our freedom to respond in the way we would wish to do so. We find the consultation to be unsound because, not only is it being held during the main holiday period for the entire year, but also when many parish councils are not holding their meetings. We strongly object to your proposal to "reclassify" the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle as a "strategic allocation" rather than a "strategic location". We object because this would mean that "future work could be progressed through a supplementary planning document (SPD) instead of an area action plan (AAP)". We object to that because an SPD would enable you to make any change you want to the growth triangle plans over the next twenty years or so without further public consultation. We would appreciate your replying fully to our letter and include it in the record of public responses to the consultation. This letter is being sent registered post.

Statement of Focussed Changes (Joint Core Strategy)

O - 11987 - 8745 - FC8 - None

11987 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Anne Cumbers [8745]

Agent: N/A

Full Text:

Summary:

I write this letter in preference to completing your "Representation form for the Consultation", as it would not enable me to state what I consider to be relevant points. I am very disappointed at your decision to hold the Consultation during the holiday period when many people are on holiday, many Parish Councils are not having meetings, thus limiting the opportunity for people to respond. I object to your proposal to reclassify the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle as a "Strategic Allocation" rather than a "Strategic Location". I also object because it would mean the future work could be progressed through a supplementary planning document (SPD) instead of an area action plan (AAP) and because an SPD would enable you to make any change you want to the Growth Triangle plans over the next twenty years or so, without further public consultation. Please reply fully to my letter and include it in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 11988 - 8746 - FC8 - None

11988 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs C.D. & J.M. Gower [8746]

Agent: N/A

Full Text:

Summary:

We wish to respond to the Greater Norwich Development Partnership Consultation on the Focussed Changes to the Joint Core Strategy. We are sure that you will understand the lateness of this response due to the consultation period having unfortunately been during the holiday period. We feel that this fact not only affects us but everyone who you should be consulting with, i.e. the general public and their representatives such as the Parish Councils that do not meet in August. As a result we feel that the process is unsound and therefore should be reprogrammed to a realistic timetable rather than appearing to be "slipped in through the backdoor, under the radar". We are writing to you as we feel that your Representation Form for the Consultation is unduly restrictive, failing to allow us appropriate freedom to respond. We strongly object to your proposal to reclassify the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle as a "strategic allocation" rather than a "strategic location". The difference is not obvious but due to the similar sound of the words seems to us deceitful. We object to it because it would mean that future proposals could be progressed through a Supplementary Planning Document instead of an Area Action Plan. That would enable you to make any change you wish to the Growth Triangle plans over the next twenty years or so without further public consultation. You have pursued these ideas for a considerable time now, despite the protestations of the local people and the recent concerns of the Planning Inspector, yet still persist. As there is now no government direction, why not give due consideration to what the people want? We will be interested to have a valued explanation for this. We request a full reply to this letter and for it to be included in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 11989 - 8087 - FC8 - i, ii, iii

11989 Object

Focussed changes Policy 10

FC8

Respondent: Miss Marguerite Finn [8087]

Agent: N/A

Full Text:

Summary:

I do not believe it is reasonable for the Council to take powers to exclude public involvement in the development of the Joint Core Strategy. This policy is an enabling document to create a strategic allocation which will be administered using a Supplementary Planning Document. The use of an SPD covering the entire Growth Triangle and for the whole of the period of this plan as a device to take total control of housing development, is extraordinary and undemocratic. It is also direct contravention of the stated aims of the government to give powers back to the communities to decide how local planning should evolve. This will ignore Parish Plans and govern by dictat, which is unacceptable. The Localism Bill which the government announced after the election must be part of any consideration of Planning Policy in the future.

Statement of Focussed Changes (Joint Core Strategy)

O - 11990 - 8060 - FC8 - None

11990 Object

Focussed changes Policy 10

FC8

Respondent: Mr Peter Lanyon [8060]

Agent: N/A

Full Text:

Summary:

It fails to comply legally because the conduct of the public consultation in which it was presented to local communities backed the Aarhus Convention in manners that I shall make clear in due course. It is unsound because, by changing the growth triangle to Strategic Allocation from a Location, it would largely exclude over a long period of public participation in the development of the JCS. This flies in the face of Government announcements about community involvement in such matters. Having participated for six and a half years in an advisory body to the Ministry Of Defence on public consultation and participation in the ISOLUS Project, I have an insight into good and bad practice in public consultation that is directly relevant here, and that is not shared by anyone else I know who is involved in the JCS or the Focussed Changes.

I have already submitted my comments within the parameters you saw fit to require in your representations document. I am adding these comments both because I believe your restriction of comments to those parameters rendered the consultation unfit for purpose, and because I insist upon being allowed to submit my comments as and how I wish, provided they are relevant and civil. Please register me as an objector and acknowledge receipt of this letter, or show reason why it has not been accepted. My comments concern Replacement Policy 10 (FC8 and FC9) and Replacement of Appendix 5 (FC10). There is manifest bad faith in such a change of status, so late and during holiday times, from a Location of 1000s of horses in the North East Norwich Triangle to a Strategic Allocation, since it deprives the public of adequate participation in the decision-making process. Difficulty of access, technical complexity, and inadequate exposure of the Focussed Changes make the bad faith appear wilful rather than incompetent. A malign intention is apparent in the Change, because its effect would be to convert the Area Action Plan into a Supplementary Planning Document, that would enable the Authorities largely to evade public participation of the developments over a long period into the future. Antisocial and anti-environmental intentions are apparent in the inevitable effects on woodlands, open spaces and parklands in the Appended Map. The predication of all these plans and changed plans upon the proposed Northern Distributor Road ensures that they are all unsound, since the handling of that road by local authorities over the past several years has lacked the honesty and openness necessary in such planning processes.

Statement of Focussed Changes (Joint Core Strategy)

O - 11992 - 8747 - FC8 - None

11992 Object

Focussed changes Policy 10

FC8

Respondent: Miss C M Parrott [8747]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11996 - 8748 - FC8 - None

11996 Object

Focussed changes Policy 10

FC8

Respondent: B C Stevenson [8748]

Agent: N/A

Full Text:

Summary:

I am responding to the GNDP Public Consultation on Focussed Changes to The Joint Core Strategy. I am doing so by letter because I feel their representation form for the Consultation unduly restricts my freedom to respond. I find the Consultation to be unsound because it has been held during the holiday period and many Parish Councils are not holding meetings. I object to their proposal to reclassify the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle as a "Strategic Allocation" rather than a "Strategic Location". I object because that would mean that future work could be progressed through a supplementary planning document (SPD) instead of an area action plan (AAP). I object to that because an SPD would enable them to make any change they wanted to the Growth Triangle plans over the next twenty years or so, without further public consultation. Please reply fully to my letter and include it in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 11998 - 8750 - FC8 - None

11998 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Anastasiou [8750]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

- i. Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii. Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during the period most councillors will be away on holiday.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 11999 - 8749 - FC8 - None

11999 Object

Focussed changes Policy 10

FC8

Respondent: Mrs M Morgan [8749]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12004 - 8751 - FC8 - None

12004 Object

Focussed changes Policy 10

FC8

Respondent: Mr Anastasiou [8751]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during the period most councillors will be away on holiday.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12007 - 8752 - FC8 - None

12007 Object

Focussed changes Policy 10

FC8

Respondent: Alison Wright [8752]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12010 - 8753 - FC8 - None

12010 Object

Focussed changes Policy 10

FC8

Respondent: J E Townsend [8753]

Agent: N/A

Full Text:

Summary:

Herewith my formal object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12013 - 8754 - FC8 - None

12013 Object

Focussed changes Policy 10

FC8

Respondent: Mrs M Mobbs [8754]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12016 - 8755 - FC8 - None

12016 Object

Focussed changes Policy 10

FC8

Respondent: R J Hastings [8755]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12019 - 8756 - FC8 - None

12019 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Roger & Janice Smith [8756]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

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* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12022 - 8757 - FC8 - None

12022 Object

Focussed changes Policy 10

FC8

Respondent: Barry John and Nicola Theobald [8757]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
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Statement of Focussed Changes (Joint Core Strategy)

O - 12025 - 8758 - FC8 - None

12025 Object

Focussed changes Policy 10

FC8

Respondent: Jeanette Rose [8758]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. Public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised but very badly advertised. Although the notice was put in the local press, many people do not take a daily newspaper and therefore would not be aware of any public meetings. No publicity was put in Salhouse and nothing was advertised at Jubilee Hall on the day, apart from the front door being left open!

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12027 - 8759 - FC8 - None

12027 Object

Focussed changes Policy 10

FC8

Respondent: Julia Yates [8759]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12031 - 8760 - FC8 - None

12031 Object

Focussed changes Policy 10

FC8

Respondent: Mr A Birks and Miss N Cook [8760]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12032 - 8761 - FC8 - None

12032 Object

Focussed changes Policy 10

FC8

Respondent: Ms Judith Hurrell [8761]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

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* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12037 - 8762 - FC8 - None

12037 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Patricia Hurrell [8762]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 12040 - 8763 - FC8 - None

12040 Object

Focussed changes Policy 10

FC8

Respondent: Sharon Ingram [8763]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12042 - 8764 - FC8 - None

12042 Object

Focussed changes Policy 10

FC8

Respondent: Mrs J Layton [8764]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12046 - 8765 - FC8 - None

12046 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Gladwell [8765]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12049 - 8766 - FC8 - None

12049 Object

Focussed changes Policy 10

FC8

Respondent: Mrs C Hollidge [8766]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12052 - 8767 - FC8 - None

12052 Object

Focussed changes Policy 10

FC8

Respondent: Mr Alan Samwell [8767]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parkland.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Please respond to this letter and include it in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12055 - 8087 - FC8 - None

12055 Object

Focussed changes Policy 10

FC8

Respondent: Miss Marguerite Finn [8087]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12058 - 8660 - FC8 - None

12058 Object

Focussed changes Policy 10

FC8

Respondent: Julie Wilson [8660]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12061 - 8768 - FC8 - None

12061 Object

Focussed changes Policy 10

FC8

Respondent: Mr Paul Osborne [8768]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12064 - 8769 - FC8 - None

12064 Object

Focussed changes Policy 10

FC8

Respondent: Jonathan Kemp [8769]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12067 - 8770 - FC8 - None

12067 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Julie Grimes [8770]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

1. Replacement Policy 10 (FC8 and FC9) Location for major new or expanded communities in Nonvich Policy Area
2. Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement.

Please register me as an objector. In my view, the Focused Changes are unsound for the Following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in northeast Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised. I myself did not know about the policy's Numbered 1 and 2 above until this week and the closing date is the 30th August.
2. Re-labelling the north-east Nonvich growth location as a Strategic Allocation to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'White space' within the growth triangle (ie land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses identified as having environmental constraints would have to be sacrificed to development, Or, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4

I object in principle to the purposed development of up to 10,000 based around a Norwich Northern Distributor Road to the north-east of Norwich. As well, as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham road and salhouse road.

It is about time we released that destroying woodland, common land were its been left to develop, nature takes its own course and wildlife has moved in Over many, many years its uniqueness should be cherish. These places should be left alone for us humans to enjoy as well as the wildlife. Once gone they will never be able to be copied for the next generation as so many other things can. Were will there children go to enjoy nature at its best see old giant trees capture there imaginations. Books, pictures, will he no sub torte for the real thing Were so lucky here in Norfolk to have these Lets Keep it that way.

Beautifil plaices for wildlife and the Mature Trees are not only providing food homes for these, There helping to clean are air. Yes, there going to plaint new saplings that yes absorb more carbon as they grow than mature trees but let us stop playing that excuse to get around cutting mature trees. In our grand children's life time they may never see the beauty of mature trees in there tall giant splendour until there 50 plus if we keep on cutting these trees down, the oak tree is now being threatened by some bug like the elm so we are losing trees so cutting healthy ones own is just radicalises .

Statement of Focussed Changes (Joint Core Strategy)

O - 12070 - 8771 - FC8 - None

12070 Object

Focussed changes Policy 10

FC8

Respondent: Miss Jenny Morgan [8771]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12073 - 8310 - FC8 - None

12073 Object

Focussed changes Policy 10

FC8

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12076 - 8310 - FC8 - i, ii, iii

12076 Object

Focussed changes Policy 10

FC8

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [none supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12077 - 8750 - FC8 - None

12077 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Anastasiou [8750]

Agent: N/A

Full Text:

Summary:

We are writing in response to the GNDP Public consultation on focused changes to the Joint Core Strategy because we feel their representation form restricts our freedom to respond and we also find the consultation to be unsound as it is being held in a holiday period when many Parish Councilors do not hold meetings.

We also object to the proposal to reclassify the growth triangle as a strategic allocation rather than a STRATEGIC LOCATION thus enabling future work to progress through a Supplementary Planning Document instead of an AREA ACTION PLAN. We object because an SPD would enable changes to the growth triangle to go ahead without further public consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12080 - 8751 - FC8 - None

12080 Object

Focussed changes Policy 10

FC8

Respondent: Mr Anastasiou [8751]

Agent: N/A

Full Text:

Summary:

We are writing in response to the GNDP Public consultation on focused changes to the Joint Core Strategy because we feel their representation form restricts our freedom to respond and we also find the consultation to be unsound as it is being held in a holiday period when many Parish Councilors do not hold meetings.

We also object to the proposal to reclassify the growth triangle as a strategic allocation rather than a STRATEGIC LOCATION thus enabling future work to progress through a Supplementary Planning Document instead of an AREA ACTION PLAN. We object because an SPD would enable changes to the growth triangle to go ahead without further public consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12081 - 8772 - FC8 - None

12081 Object

Focussed changes Policy 10

FC8

Respondent: Mrs N.H McQueen [8772]

Agent: N/A

Full Text:

Summary:

- 1) I find the representation form restricts the answer one would like to give.
- 2) I object to the proposal to reclassify the land area with wording Strategic Allocation instead of Strategic Location.
- 3) The SPD suggestion is very misleading replacing the AAP which gave people a more fair idea of what the planners wish to do, and as it is going to affect the area over the next twenty to thirty years it is very important. The people who live in this area are the people to be listened too, and their opinions appreciated.

Statement of Focussed Changes (Joint Core Strategy)

O - 12082 - 8773 - FC8 - None

12082 Object

Focussed changes Policy 10

FC8

Respondent: Mr Rodney McQueen [8773]

Agent: N/A

Full Text:

Summary:

The representation form is misleading and I feel the questions are loaded in favour of the Proposer. The consultation period is not long enough, and it is not fair at this time when the Parish Councils are not meeting. I object to the reclassification of the area proposed wording i.e. strategic allocation instead of location. In my opinion the SPD is deliberately misleading and the actual true intentions are not clear, in fact it is a con, taking away the democratic right of objecting to bad building programmes, which would effectively rape a beautiful area.

Statement of Focussed Changes (Joint Core Strategy)

O - 12086 - 8309 - FC8 - None

12086 Object

Focussed changes Policy 10

FC8

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe st Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12096 - 8776 - FC8 - None

12096 Object

Focussed changes Policy 10

FC8

Respondent: T E Carter [8776]

Agent: N/A

Full Text:

Summary:

I am responding to the GNDP public consultation on focussed changes to the joint core strategy. I am doing so by letter because I feel the representation form for the consultation unduly restricts me from the freedom to respond.

I find the consultation to be unsound because it is being held during the holiday period and many Parish Councils will not be holding meetings during this time.

I object to the proposal to reclassify the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle as a "strategic allocation" rather than a "strategic location".

I object because it would mean that any future work could be progressed through a supplementary planning document (SPD) instead of an area action plan (AAP).

I strongly object because an SPD would enable you to make the change you want to the growth triangle plans in years to come without public consultation.

I would like a full reply to my letter and also I request you to include this letter in the record of public responses to the consultation.

I have sent this correspondence by recorded delivery.

Statement of Focussed Changes (Joint Core Strategy)

O - 12097 - 8777 - FC8 - None

12097 Object

Focussed changes Policy 10

FC8

Respondent: Mrs J A Watts [8777]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12101 - 8778 - FC8 - None

12101 Object

Focussed changes Policy 10

FC8

Respondent: R Harris [8778]

Agent: N/A

Full Text:

Summary:

I am responding to the GNDP public consultation on focussed changes to the Joint Core Strategy. The reason i am writing this letter as your representation form for the consultation restricts my freedom to respond. the consultation is very unsound as it is held during the holiday period when my parish council is not holding a meeting. The proposal to reclassify the Old Catton, Sprowston, Rackheath, Thorpe St Andrew [Growth Triangle] as a 'strategic allocation', rather than a location really must be objected to. My objection is that future work could be progressed through an SPD, instead of an AAP. I find this is most undemocratic as it would enable you to make any changes you want to the 'Growth Triangle' plans over the next 20 years plus, without the public having any say. I have every hope that thus is not the case and would appreciate a reply to this effect. Please include this letter in the record of public response to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12108 - 8309 - FC8 - i, ii, iii

12108 Object

Focussed changes Policy 10

FC8

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12111 - 8779 - FC8 - None

12111 Object

Focussed changes Policy 10

FC8

Respondent: Margaret Prime [8779]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. Also the use of top grade agricultural land being used for building when food for future generations will be so important. How stupid is this?

Statement of Focussed Changes (Joint Core Strategy)

O - 12116 - 8458 - FC8 - None

12116 Object

Focussed changes Policy 10

FC8

Respondent: Mr John Michael Evans [8458]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12119 - 8780 - FC8 - None

12119 Object

Focussed changes Policy 10

FC8

Respondent: Mr Eric Wise [8780]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the focused changes:

- i) Replacement Policy 10 (FC8 & FC9): Locations for major new or expanded communities in the Norwich Policy area.
- ii) Replacement appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle concept statement.

Please register me as an objector. In my view the focused changes are very unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed concept statement.

No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

2. Re-labelling the North East Norwich growth location as a 'Strategic Allocation', to be followed up by a supplementary planning document rather than an area action plan, is intended to speed up the planning process and avoid the requirement for a public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on

the proposals map accompanying appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space and therefore either some land identified as having environmental constraints would have

to be sacrificed to development, or the proposed number of new builds would have to be scaled down.

THE JCS AND FOCUSED CHANGES DO NOT ADDRESS THIS IMPORTANT ISSUE.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Northern Distributor Road to the North East of Norwich. As well as a loss of countryside a development on this scale will result in other adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road, also impacting heavily on other major roads to the east.

Statement of Focussed Changes (Joint Core Strategy)

O - 12122 - 8782 - FC8 - None

12122 Object

Focussed changes Policy 10

FC8

Respondent: Ms Thelma Berry [8782]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement. Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12125 - 8651 - FC8 - None

12125 Object

Focussed changes Policy 10

FC8

Respondent: Greg Townes [8651]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12128 - 8783 - FC8 - None

12128 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Linda Townes [8783]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12131 - 8784 - FC8 - None

12131 Object

Focussed changes Policy 10

FC8

Respondent: Mr Martin Thurlow [8784]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12134 - 8785 - FC8 - None

12134 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Simon and Veronique Cornish [8785]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register US as objectorS. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12137 - 8786 - FC8 - None

12137 Object

Focussed changes Policy 10

FC8

Respondent: Mr Anthony Austwick [8786]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector.

In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road, Salhouse Road and the Plumstead Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12140 - 8787 - FC8 - None

12140 Object

Focussed changes Policy 10

FC8

Respondent: Prof Leslie H Sutcliffe [8787]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12143 - 8788 - FC8 - None

12143 Object

Focussed changes Policy 10

FC8

Respondent: Mrs A J Gates [8788]

Agent: N/A

Full Text:

Summary:

With reference to the GNDP Public Consultation on Focussed changes to the Joint Core Strategy. I am writing to you as I feel very strongly about the timing of this consultation, why choose a period when most people take their holidays. Also I object to future work could be progressed through a Supplementary Planning Document, instead of an Area Action Plan.

I believe that all plans should be open to local people to take part in consultation I also thought that public consultation was now part of the New Government manifesto.

I would ask you to reply to this letter as I want my feelings to be recorded in the public response to the Consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12144 - 8790 - FC8 - None

12144 Object

Focussed changes Policy 10

FC8

Respondent: Mr Mark Gunton [8790]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12147 - 8789 - FC8 - None

12147 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs J P and H A Shanks [8789]

Agent: N/A

Full Text:

Summary:

We are very concerned by the fact that the public consultation period regarding the Focussed Changes to the Joint Core Strategy has been held during the holiday period. This has limited the opportunities for local views to be heard. Neither are we satisfied with the proposal to reclassify this area as a 'strategic allocation', which we believe would mean that future work could be progressed through a Supplementary Planning Document instead of a Area Action Plan. We understand that the effect of re-classification to an SPD would be that changes could be made to the Growth Triangle Plans without further public consultation. This, in our view, is undemocratic and improper. Whilst we appreciate the importance of meeting social needs, it is the massive scale of the growth, without the need for local consensus, which we find totally unacceptable. We have read local news accounts about our woodlands being considered for development. Local people feel desperate about this - for themselves and future generations - and we do not see how the so-called guardians of our county could have even considered this step. We strongly urge district councils to work with local people to find a better way forward. For example, by small-scale developments that support individual local needs and job opportunities; spread around the county and in areas where they exist. We have responded by letter rather than on the Representation Form, which appears too prescriptive, but trust that you will include this in the record of public responses.

Statement of Focussed Changes (Joint Core Strategy)

O - 12150 - 8792 - FC8 - None

12150 Object

Focussed changes Policy 10

FC8

Respondent: Mrs Susan Simpson [8792]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12153 - 8793 - FC8 - None

12153 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs WJ Bateman [8793]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12157 - 8791 - FC8 - None

12157 Object

Focussed changes Policy 10

FC8

Respondent: M J Canfor [8791]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 12159 - 8794 - FC8 - None

12159 Object

Focussed changes Policy 10

FC8

Respondent: Sarah Tetlow [8794]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12164 - 8795 - FC8 - None

12164 Object

Focussed changes Policy 10

FC8

Respondent: H Canfor [8795]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12167 - 8796 - FC8 - None

12167 Object

Focussed changes Policy 10

FC8

Respondent: Michael Tetlow [8796]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12171 - 8797 - FC8 - None

12171 Object

Focussed changes Policy 10

FC8

Respondent: Mr and Mrs P Raven [8797]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12175 - 8799 - FC8 - None

12175 Object

Focussed changes Policy 10

FC8

Respondent: M D Absalom [8799]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12178 - 1781 - FC8 - None

12178 Object

Focussed changes Policy 10

FC8

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

The Parish Council objects to the changes made in the revised policy, because

1. The replacement policy is a significant extension to that originally proposed and now covers the whole of the growth triangle.

2. The policy also changes the status of the whole area to a Strategic Allocation. There is no justification for this. Changing this designation would be contrary to the policies set out by the Government to give local people more influence on development in their neighbourhood.

The Localism Bill will introduce measures to shift power back into the hands of individuals, communities and councils and give local communities a real share in growth. We look forward to this change and in the meanwhile do not believe that the proposals contained in this consultation are compatible with the Governments objectives.

Statement of Focussed Changes (Joint Core Strategy)

O - 12180 - 7172 - FC8 - i, ii, iii

12180 Object

Focussed changes Policy 10

FC8

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary: FC8 is not Sound for the following reasons:

Overall, the growth triangle as a strategic allocation is not justified, as it is not the most appropriate strategy when considered against the reasonable alternatives. Reasonable alternatives for the allocation of the growth in the growth triangle were not adequately considered

FC8 is not justified in describing the 'strategic allocation' as "deliver(ing) an urban extension on both sides of the Northern Distributor Road, within the area shown in appendix 5". A NDR is shown passing through an Area of Landscape Value (ALV) inside the Growth Triangle and forms part of the northern boundary of the growth area. Land proposed for development butts the ALV and not the NDR. The implications for travel include:

- new communities either side of a NDR would remain separated by the ALV through which a NDR route passes;
- Rackheath eco-town would be freestanding and largely isolated from any urban extension inside the ALV. New Rackheath is the only settlement within the growth triangle to be physically connected to non-eco development west inside ALV.
- Rackheath eco-town would be largely served by the two existing radial roads which border the new settlement - A1151 Wroxham Road and Salhouse Road.
- Residents living along Salhouse Road in New Rackheath would suffer an increase in traffic from the eco-town and further afield.
- Between the Outer and Inner Ring Roads Salhouse Road crosses the sensitive Mousehold Heath set up by Act of Parliament and additional traffic passing across the heathland would be detrimental.
- a NDR cannot be described as 'permeable' in passing through the ALV inside the growth triangle. Vehicular traffic movement would be confined to the radial roads bordering the growth triangle. Although the LAV would be attractive for walking and cycling across the area during daylight hours, from a safety and security angle it would not be so after dark, even if the paths are well lit.

Far from the GNPD claim that the growth triangle is dependent on a NDR, there is little justification for building the road. Road space on the existing network can be freed up for public transport, walking and cycling through implementation of smart choices.

In conclusion, the policy fails to demonstrate that a NDR is the most appropriate basis for a transport strategy for serving the growth triangle.

FC8 is unlikely to be deliverable and is therefore not effective. There is a high degree of uncertainty concerning the NDR, with consequences for delivery of a strategic allocation.

Reclassification of the strategic location as a 'strategic location' could be seen as a mechanism to avoid the need to develop a DPD and therefore avoid the need to undertake the requirements of an Area Action Plan DPD; namely to be subject to an Examination in Public. This risks being contrary to national policy as moves designed to circumvent such requirements are expressly discouraged. PPS12 states "SPDs should not be prepared with the aim of avoiding the need for the examination of policy which should be examined." (6.1)

Statement of Focussed Changes (Joint Core Strategy)

O - 12185 - 8798 - FC8 - None

12185 Object

Focussed changes Policy 10

FC8

Respondent: Diana Campbell [8798]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12188 - 8801 - FC8 - None

12188 Object

Focussed changes Policy 10

FC8

Respondent: Mr R J Halford [8801]

Agent: N/A

Full Text:

Summary:

Having just driven from Rackheath to Wroxham and observed once again the extreme pressure of traffic on the way into Hoveton, particularly at this time of year, even without any further housing development in the general area, I wish to formally object to the Focussed Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12195 - 8800 - FC8 - None

12195 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Ray & Maureen Anderson [8800]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12199 - 8268 - FC8 - None

12199 Object

Focussed changes Policy 10

FC8

Respondent: RSPB (East of England Regional Office) (Dr Philip Pearson) [8268] **Agent:** N/A

Full Text:

Summary:

Thank you for consulting the RSPB regarding the amendment to the Statement of Focussed Changes (SFC) of the Joint Core Strategy (JCS) for Greater Norwich. Our comments focus primarily on the proposal to progress the Old Catton, Sprowston, Rackheath growth triangle (OCSRGT) as a Supplementary Planning Document (SPD) rather than an Area Action Plan (AAP). Additional comments pertinent to the soundness and deliverability of the JCS as a result of changes to Appendix 5 are then provided. Our response dated 14th December 2009 still remains relevant, with the comments below being supplementary to it.

Comments on the proposed use of a SPD to progress the OCSRGT. Bullet point three of the Foreword to the SFC (p. 1) states the Greater Norwich Development Partnership's (GNDP's) intention to progress the proposed OCSRGT as a SPD not an AAP. In determining the appropriateness of a SPD to progress the OCSRGT it is pertinent to consider the uncertainties in delivering the scale of growth planned for the Greater Norwich area. This further assessment work is necessary because the February 2010 Appropriate Assessment (AA) identified a number of uncertainties that have not yet been resolved regarding the cumulative and in-combination effects of the JCS policies on water resources, water efficiency, growth and tourism¹. Although mitigation measures have been proposed in the AA, the efficacy and/or viability of a number of them remains uncertain. If effective mitigation of development impacts is not possible, the development will not be able to go ahead. The RSPB has previously stated that a lack of a rigorous cumulative and in-combination assessment regarding the impact of water availability, water quality and recreation on the Broads Natura 2000 sites at the JCS stage creates uncertainty over the delivery of these proposals, which calls the soundness of the JCS into question. The updated AA does not allay our concerns regarding the JCS's deliverability or soundness. In addition, the continued reliance upon the Northern Distributor Road (NDR) as an integral part of the JCS remains a serious concern for the deliverability of the JCS. Paragraph 44 of Appendix 5 (p. 22) that it is "...critical to a commitment to the scale of development proposed." Uncertainty over the delivery of the NDR remains and the number of houses that can be delivered in the GCSRGT area will be significantly reduced in any scenario where the NDR is not constructed. Improvements to the Postwick junction are also seen as important in delivering the aspirations of the JCS, but its delivery also remains uncertain. This significant uncertainty over critical pieces of infrastructure continues to undermine the soundness and deliverability of the JCS's housing delivery and strategic growth in its current form. Consequently, a significant amount of additional work is required to ensure that any development does not result in adverse effects to the Broads Natura 2000 sites and that the proposed scale of growth in the OCSRGT would be deliverable. The proposed 10,000 new dwellings by 2026 equates to 46% of the remaining 21,570 to be built within the JCS' area. If this development cannot be delivered this will have serious consequences for the delivery of the JCS.

The RSPB considers that the complexity of the unresolved issues relating to the OCSRGT go beyond the scope of a SPD, and are such that it would not be appropriate to make a strategic allocation through the Core Strategy. We consider that the scale of growth and the infrastructure requires a more detailed and rigorous examination process than it has received to date and that an AAP, as part of the area's development plan, would be more suitable than a SPD.

Conclusions

The RSPB considers that:

- * The OCSRGT is best addressed through an AAP rather than a SPD. We consider that progressing development in this area through an AAP would provide greater certainty over its deliverability and soundness, as it would be subjected to a more rigorous examination process.
- * Full consideration of cumulative and in-combination effects should be considered at the JCS stage. Failure to undertake a thorough assessment at this stage potentially undermines the deliverability and soundness of lower-tier documents.
- * Considerable uncertainty remains over the delivery of the housing and transport strategies. This particularly relates to the need to prevent adverse effects to Natura 2000 sites through impacts on water availability, water quality and recreational disturbance.
- * An over-reliance on the NDR and Rackheath ecotown, both of which have significant uncertainties over their delivery, either in part or their entirety, places serious question marks over the deliverability and soundness of the JCS. This is particularly the case where no alternative ways of delivering the planned development within the Greater Norwich area have been considered by the GNDP.

We trust that these comments are helpful. If you have any further queries, please do not hesitate to contact me.

It is still our intention to attend the Examination In Public (EIP) of the Joint Core Strategy, particularly sessions covering the spatial strategy, OCSRGT and biodiversity.

Statement of Focussed Changes (Joint Core Strategy)

O - 12204 - 8804 - FC8 - None

12204 Object

Focussed changes Policy 10

FC8

Respondent: Roger and Julie Aspland [8804]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12207 - 8805 - FC8 - None

12207 Object

Focussed changes Policy 10

FC8

Respondent: Ms Hilary Howells [8805]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12212 - 8806 - FC8 - None

12212 Object

Focussed changes Policy 10

FC8

Respondent: Mr C S Spelman [8806]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12216 - 8807 - FC8 - None

12216 Object

Focussed changes Policy 10

FC8

Respondent: Nicolette Mary Richards [8807]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12221 - 8810 - FC8 - None

12221 Object

Focussed changes Policy 10

FC8

Respondent: Roger Dobson [8810]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12225 - 8812 - FC8 - None

12225 Object

Focussed changes Policy 10

FC8

Respondent: Christopher and Gaynor Peck [8812]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

S - 12230 - 8352 - FC8 - None

12230 Support

Focussed changes Policy 10

FC8

Respondent: Environment Agency (Eastern Area Office) (Miss Jessica Bowden) [8352] **Agent:** N/A

Full Text:

Summary:

Although we do not consider there is sufficient evidence to find this change unsound, we ask that the GNPD considers the following:

This proposed change to policy 10 reclassifies the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle as a "strategic allocation" rather than a "strategic location" meaning that future work can be progressed through a Supplementary Planning Document (SPD) rather than an Area Action Plan (AAP). We understand that an SPD adds detail/guidance to policies within other DPDs, but is not itself able to set new policy as an AAP could. Furthermore, it is not subject to independent examination. In the absence of such an AAP, the policy framework to guide development in this location will be formed by national policy and the policies set out in the Joint Core Strategy (JCS) and other DPDs. However, the growth triangle to which this policy change relates includes the proposed Rackheath eco-community, the sustainability requirements of which may be more stringent than the requirements set out by the JCS. Currently there is no specific policy within the JCS relating to the aspirations for the eco-community; an AAP for the growth triangle area would have presented an opportunity to develop

detailed policies in this respect. We understand that, although the SPD would be a material planning consideration, it will not be able to set new policy through which planning officers are able to require certain high sustainability standards. We are mindful that national policy currently exists in the form of the supplement to Planning Policy Statement 1 (PPS1):

Eco-towns. This national policy ensures that future eco-communities meet higher standards than would perhaps otherwise be met. However, when considering the agenda of the current government, the future of such national policy documents remains uncertain. We highlight the clear aspiration within paragraph 6.14 of the JCS for the eco-community to remain even if the

Government programme falters as well as the vision set out in the proposed concept statement (appendix 5) for the remainder of the growth triangle to be influenced by the Rackheath development. A Water Cycle Study (WCS) for the North East Norwich area, including the Rackheath eco-community, is due to be undertaken in the near future. Further to the comments made within the preceding paragraph we are concerned that, without the supplement to PPS 1 and without

the prospect of future policy through an AAP, there may be no formal policy mechanism by which to ensure that the recommendations given by the forthcoming WCS, particularly relating to water issues, are translated into the ecocommunity and beyond. We are supportive of the reference to sustainability measures, particularly with regard to water efficiency, within the concept statement. However, we suggest it may be beneficial to include additional assurance that the highest possible

environmental standards will be sought, particularly within the eco-community, in line with the current requirements of the

supplement to PPS 1. In addition to the above comments, we would also like to take this opportunity to draw your attention to the area of flood zone 3 located west of Rackheath and south of Beeston Park. It should be noted that development in this area should accord with the sequential approach as set out in Planning Policy Statement 25 (PPS25) : Development and Flood Risk. Should development be located within areas of flood risk, the sequential test and exception test should be passed and the

proposal should be supported by a site specific flood risk assessment. Notwithstanding the above comments, we would like to take this opportunity to recognise and support the inclusion of reference to green infrastructure, sustainable drainage, protection of biodiversity and water efficiency within the concept statement at appendix 5. We have previously provided comments regarding the proposed AAP which we understand will be taken into

consideration in the development of the proposed SPD. We ask to be consulted throughout the production of the SPD where we would be happy to provide further comments and guidance.

Statement of Focussed Changes (Joint Core Strategy)

O - 12232 - 8813 - FC8 - None

12232 Object

Focussed changes Policy 10

FC8

Respondent: Mr Jonathan Breed [8813]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12236 - 8057 - FC8 - None

12236 Object

Focussed changes Policy 10

FC8

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

Focussed change: Policy 10 Locations for major new, or expanded communities in the Norwich Policy Area
3. Focussed change: Appendix 5 Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Area Triangle Concept Statement. It is noted that the proposed change from the production of an Area Action Plan to the provision of a Supplementary Planning Document supported by a concept statement embeds the decision of Broadland District Council to follow this approach as set out in their adopted Local Development Scheme (December 2009). Whilst the Highways Agency has no objection in principle to this approach and accepts the need/desire for increasing housing growth rates, there is some concern that without careful planning, there is a danger that the area will be developed in a piece meal approach rather than taking a holistic view of the whole area and developing overall master planning and implementation policies which would then be subject to independent scrutiny. The Highways Agency has worked with Norfolk County Council on understanding the transport implications of growth in the Norwich area and contributed to the development of the evidence base. In conjunction with this significant work has been undertaken looking at the impacts of growth on the A47 Postwick Interchange and developing a junction scheme which would facilitate the delivery of the proposed Northern Distributor Route and enable delivery of local employment areas (e.g. Broadland Gate). The acceptable conclusions of that work were based on assumptions that the delivery of sustainable growth in the triangle area would significantly influenced by high modal shift away from travel by private car. If the area is developed on a piece meal approach then there is a high risk that sufficient levels of modal shift will not be achieved, the opportunities of economies of scale lost and the highway network will not be able to cope with potential future levels of traffic. Ultimately this could in the long term have a bearing on achieving planning consents for development towards the end of the plan period. Consequently, the Highways Agency's preference is to retain the concept of an Area Action Plan which will focus on the implementation and delivery of the whole area and developing area wide mechanisms which will be subject to independent scrutiny, i.e. the development of a managed process of delivery. If this approach is not taken and there is a more piece meal approach to delivery based on a Supplementary Planning Document, then it will be essential that the local planning authority in pressing forward with early delivery of growth considers at all times the implications of the 'bigger picture' and mechanisms are put in place to ensure this takes place in full consultation with strategic partners.

Statement of Focussed Changes (Joint Core Strategy)

O - 12243 - 8814 - FC8 - None

12243 Object

Focussed changes Policy 10

FC8

Respondent: Christopher Lawrence Hiscox [8814]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12250 - 1823 - FC8 - None

12250 Object

Focussed changes Policy 10

FC8

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

The Parish Council objects to the changes made in the revised policy, because:

1. The replacement policy is a significant extension to that originally proposed and now covers the whole of the growth triangle.

2. The policy also changes the status of the whole area to a Strategic Allocation. There is no justification for this. Changing this designation would be contrary to the policies set out by the Government to give local people more influence on development in their neighbourhood.

The Localism Bill will introduce measures to shift power back into the hands of individuals, communities and councils and give local communities a real share in growth. We look forward to this change and in the meanwhile do not believe that the proposals contained in this consultation are compatible with the Government's objectives.

Statement of Focussed Changes (Joint Core Strategy)

O - 12257 - 8047 - FC8 - None

12257 Object

Focussed changes Policy 10

FC8

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary:

The Parish Council objects to the changes made in the revised policy, because

1. The replacement policy is a significant extension to that originally proposed and now covers the whole of the growth triangle.
2. The policy also changes the status of the whole area to a Strategic Allocation. There is no justification for this. Changing this designation would be contrary to the policies set out by the Government to give local people more influence on development in their neighbourhood.

Statement of Focussed Changes (Joint Core Strategy)

O - 12260 - 6540 - FC8 - None

12260 Object

Focussed changes Policy 10

FC8

Respondent: Mr James Cleaver [6540]

Agent: N/A

Full Text:

Summary:

I am responding to the GNDP Public Consultation on Focussed Changes to the Joint Core Strategy. I am doing so by letter because I feel your Representation Form for the Consultation unduly restricts my freedom to respond. I find the consultation to be unsound because it is being held during the holiday period and when many Parish Councils are not holding meetings. I object to your proposal to declassify the Old Catton , Sprowston, Rackheath, Thorpe St Andrew Growth Triangle as a "strategic allocation" rather than a "strategic location" because that would mean that future work could be progressed through a Supplementary Planning Document (SPD) instead of an Area Action Plan (AAP). I object to that because an SPD would enable you to make any change you wanted to the Growth Triangle plans over the next twenty years or so without further public consultation - how does that serve your people?

Statement of Focussed Changes (Joint Core Strategy)

O - 12261 - 8821 - FC8 - None

12261 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Frank & Karen Reding [8821]

Agent: N/A

Full Text:

Summary:

We wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew
Growth Triangle Concept Statement Please register us as objectors. In our view the Focused Changes are unsound for the following

reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in northeast Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. We are concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. We are concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. We object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12264 - 8822 - FC8 - None

12264 Object

Focussed changes Policy 10

FC8

Respondent: Mr Nicholas Wiltshire [8822]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area

ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
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Statement of Focussed Changes (Joint Core Strategy)

O - 12267 - 8820 - FC8 - None

12267 Object

Focussed changes Policy 10

FC8

Respondent: Simon Kett [8820]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12270 - 8823 - FC8 - None

12270 Object

Focussed changes Policy 10

FC8

Respondent: Mr Greg Insull [8823]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement.

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation'

has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the

Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to

have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as

having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major

traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12294 - 8669 - FC8 - None

12294 Object

Focussed changes Policy 10

FC8

Respondent: Mr Tom Self [8669]

Agent: N/A

Full Text:

Summary:

I am writing a letter of response for the GNDP Public Consultation on Focussed changes to the Joint Core Strategy. I have chosen to express my objections via letter as I strongly feel that your Representation Form for the Consultation significantly restricts the comments and views that one can give.

My main objection to the consultation is that it is unsound. It is being held during the holiday period when many Parish Councils are not holding public meetings. This means none of the local Parish Councils will be able to discuss the proposals, without holding a special meeting. I also feel it is unsound, as many of your proposals and documents are not clearly understood by the majority of the public. Many residents have struggled to understand what is being proposed, and instead of sharing their views have simply given up trying. Most of the proposals do not make sense, unless one has a clear view of what an SPD actually is. It is no surprise that not a single document of yours bears the Plain English Campaign Crystal Mark.

I am also objecting to your proposal to reclassify the Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Area as a 'strategic allocation', rather than a 'strategic location'. The main reason for this is because future work could be progressed through a Supplementary Planning Document (SPD) rather than an Area Action Plan (AAP). If your proposal is passed, then an SPD would enable you to make any changes you wished to the Growth Triangle, without any further public consultation.

I would like you to include this letter of complaint in your record of public responses to the consultation. I would also like a full reply to my letter, including your reasons for creating an unsound consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12297 - 8589 - FC8 - i, ii, iii

12297 Object

Focussed changes Policy 10

FC8

Respondent: SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589] **Agent:** N/A

Full Text:

Summary:

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It is has yet to be considered by the GNDDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

Policy FC8 Growth Triangle

In objecting to the changes made in the revised policy, the following reasons are given.

1. The replacement policy represents a significant extension to the originally proposal and it explicitly covers the whole of the growth triangle. This will merely permit further and more concentrated urbanisation of this rural area into the future.
2. The policy also changes the status of the whole area to a Strategic Allocation. There is no justification for this. The need to introduce this designation was queried by the Planning Inspectors at the Exploratory Meeting. Changing this designation would be contrary to the plans set out by the Government to give local people more influence over development in their neighbourhood.
3. A 'Localism Bill' is to be introduced to shift power back into the hands of individuals, communities and councils and give local communities a real share in growth. We look forward to this change and in the meanwhile do not believe that the proposals contained in this consultation are compatible with the Government's objectives.

Statement of Focussed Changes (Joint Core Strategy)

O - 12300 - 8835 - FC8 - None

12300 Object

Focussed changes Policy 10

FC8

Respondent: Wroxham Parish Plan Group (R B Colman) [8835] **Agent:** N/A

Full Text:

Summary:

I write on behalf of the Wroxham Parish Plan Group. The Group was formed under the auspices of the Wroxham Parish Council in line with the Government initiative to encourage village communities to have their say on matters affecting the village. As usual in the initiative the opinion of each household on a wide range of issues was gleaned by means of a questionnaire. We undertook the questionnaire survey in the spring of this year. We have a response from 443 households out of a total of 654 primary residences (second homes and holiday lets being discounted). This response reflects a 68% return, compared with 65% in the recent general election. We therefore consider that we have a mandate to speak for the whole Village.

The answers to a number of questions relevant to your enquiry were:

Q39 Wroxham is designated as a Key Service Centre in the proposed Joint Core Strategy for Greater Norwich. It is proposed that it is therefore suitable to receive 200-300 new dwellings between now and 2026. Is Wroxham well placed to cope with this development?

Yes 49 No 343

Q40 is the existing village infra-structure able to support the development of 200-300 extra houses

Yes 35 No 352

Q41 Does anyone in your household need their own housing in Wroxham?

Yes 35 No 381

Q43 Do you know anyone who has had to move away from Wroxham because they could not find housing locally that they could afford?

Yes 57 No 330

Q46 Are you in agreement with the intended Eco town in Rackheath?

Yes 80 No 304

Q47 Are you in agreement with the proposed conference and tourist development in Salhouse?

Yes 79 No 225

We urge you to take the views of a community such as ours into account in your deliberations.

Statement of Focussed Changes (Joint Core Strategy)

O - 12308 - 8837 - FC8 - None

12308 Object

Focussed changes Policy 10

FC8

Respondent: L Stavridis [8837]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector and acknowledge receipt of this latter. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12311 - 8838 - FC8 - None

12311 Object

Focussed changes Policy 10

FC8

Respondent: Mr Jason Michael Hollidge [8838]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12315 - 8840 - FC8 - None

12315 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs Sue and Graham Bergin [8840]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

S - 12321 - 6993 - FC8 - None

12321 Support

Focussed changes Policy 10

FC8

Respondent: Thorpe and Felthorpe Trust [6993]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text:

Summary:

The TFT support the formalisation of the status of the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle as a strategic allocation in the Core Strategy. Due to the existence of the Broadland, Meridian and St Andrews business parks, the existing Bittern Line railway service and considerable land opportunities, the fundamental geography of the sites offer the opportunity for the creation of a genuinely sustainable approach to growth within Broadland and to the city of Norwich that is infrastructure and land use efficient, and which will develop a beneficial economic proposition.

Statement of Focussed Changes (Joint Core Strategy)

O - 12324 - 8687 - FC8 - None

12324 Object

Focussed changes Policy 10

FC8

Respondent: Mr John Allaway [8687]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12329 - 8844 - FC8 - None

12329 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs R.J & E.M Saunders [8844]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12332 - 8845 - FC8 - None

12332 Object

Focussed changes Policy 10

FC8

Respondent: Mr & Mrs David George [8845]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11741 - 8606 - FC9 - i, ii, iii

11741 Object

Focussed changes Policy 10

FC9

Respondent: Sara Beaven [8606]

Agent: N/A

Full Text: I do not believe that the North East of Norwich should have the growth triangle status. There was not consultation to ask if residents wanted growth point status and there is no mandate for the council to presume they represent the residents views. Growth should be located to the south of Norwich where transport links are good and employment opportunities exist. The NDR funding is not guaranteed and the North East of Norwich cannot support this level of growth.

Summary: I do not believe that the North East of Norwich should have the growth triangle status. There was not consultation to ask if residents wanted growth point status and there is no mandate for the council to presume they represent the residents views. Growth should be located to the south of Norwich where transport links are good and employment opportunities exist. The NDR funding is not guaranteed and the North East of Norwich cannot support this level of growth.

Statement of Focussed Changes (Joint Core Strategy)

S - 11752 - 8668 - FC9 - None

11752 Support

Focussed changes Policy 10

FC9

Respondent: National Grid (Bethany Tucker) [8668]

Agent: N/A

Full Text:

Summary:

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

- Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties

http://www.nationalgrid.com/NR/rdonlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf

- Gas Transmission Underground Pipelines - Guidance

http://www.nationalgrid.com/NR/rdonlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance_2_.pdf

Statement of Focussed Changes (Joint Core Strategy)

O - 11757 - 8670 - FC9 - None

11757 Object

Focussed changes Policy 10

FC9

Respondent: Dr Lorraine Maitland [8670]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11760 - 8672 - FC9 - None

11760 Object

Focussed changes Policy 10

FC9

Respondent: Mr Peter Moy [8672]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road, Salhouse Road and Plumstead Road East - non of which are suitable for widening within the 'built-up area'.

Statement of Focussed Changes (Joint Core Strategy)

O - 11763 - 8673 - FC9 - None

11763 Object

Focussed changes Policy 10

FC9

Respondent: Mr Ian Muller [8673]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11766 - 8674 - FC9 - None

11766 Object

Focussed changes Policy 10

FC9

Respondent: Carl & Diana Wainwright [8674]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11769 - 8675 - FC9 - None

11769 Object

Focussed changes Policy 10

FC9

Respondent: Nichola Cable & Aaron Joyce [8675]

Agent: N/A

Full Text:

Summary: We wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area.
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement.

Please register us both as objectors. In our view the Focused Changes are unsound for the following reasons: -

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage, with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. We are concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5, such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. We are concerned that the proposed number of new houses cannot be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed for development OR the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this very important issue.
4. We object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as a considerable loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11772 - 8676 - FC9 - None

11772 Object

Focussed changes Policy 10

FC9

Respondent: C Hipperson [8676]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11777 - 8677 - FC9 - None

11777 Object

Focussed changes Policy 10

FC9

Respondent: R Newton [8677]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11780 - 8678 - FC9 - None

11780 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs R C Burton [8678]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11783 - 8679 - FC9 - None

11783 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs P W Dade [8679]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11786 - 8680 - FC9 - None

11786 Object

Focussed changes Policy 10

FC9

Respondent: John Tink and Janet Mann [8680]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11789 - 8681 - FC9 - None

11789 Object

Focussed changes Policy 10

FC9

Respondent: Mrs and Mr Julie and Simon Hunt [8681]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11792 - 8682 - FC9 - None

11792 Object

Focussed changes Policy 10

FC9

Respondent: Marie Smithson [8682]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11795 - 8683 - FC9 - None

11795 Object

Focussed changes Policy 10

FC9

Respondent: Ray, Olive and Simon Halliday [8683]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11802 - 8685 - FC9 - None

11802 Object

Focussed changes Policy 10

FC9

Respondent: Joan Middleton [8685]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11805 - 8686 - FC9 - None

11805 Object

Focussed changes Policy 10

FC9

Respondent: Mrs P Hardie [8686]

Agent: N/A

Full Text:

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We need to be far more self sufficient in food production, therefore NO development on our farmland.

Statement of Focussed Changes (Joint Core Strategy)

O - 11810 - 8688 - FC9 - None

11810 Object

Focussed changes Policy 10

FC9

Respondent: Mr Clive Keable [8688]

Agent: N/A

Full Text:

Summary:

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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
 2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
 3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
 4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11822 - 8693 - FC9 - None

11822 Object

Focussed changes Policy 10

FC9

Respondent: John & Janice Waters [8693]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11829 - 8694 - FC9 - None

11829 Object

Focussed changes Policy 10

FC9

Respondent: F Jeans [8694]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11831 - 8216 - FC9 - ii

11831 Object

Focussed changes Policy 10

FC9

Respondent: Mr Paul Dunthorne [8216]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary: Paul Dunthorne considers JCS Focussed Change 9 (FC9) to be unsound on the basis that it results in an inflexible policy and therefore fails the Effectiveness soundness test. This representation is also relevant to FC10.

Reasons:

Paul Dunthorne notes the ambition for a single co-ordinated approach across the NE Norwich Growth Triangle area and accepts that this may be relevant for the management and delivery of major/strategic growth proposals within the Growth Triangle.

However, Paul Dunthorne objects to the Focussed Changes' failure to acknowledge the role that 'small sites' in and adjacent to Rackheath, but outside of the current Eco-Community site boundary could have in meeting local housing need.

Paul Dunthorne suggests that the focussed changes to Policy 10 (FC 9 & related appendix FC10) should have made provision for small 'non strategic' sites to come forward independently of the Eco-Community where sufficient infrastructure capacity exists and development would not prejudice the delivery of the Eco-Community. Such sites would have an important role in helping to ensure an ongoing supply of homes to meet existing housing demand in the Rackheath area during the period before the major growth locations deliver substantial numbers of new homes and especially given the current lack of housing supply in the area.

Paul Dunthorne also suggests that including such provision in JCS Policy 10 would enable small 'non strategic' development to come forward at Rackheath in the event that the new Government decides not to proceed with the Eco-Towns programme. Without this flexibility the JCS is potentially unsound.

Policy 10's failure to acknowledge the role of small 'non strategic' sites in Rackheath that are outside of the landowner/promotional agreement/arrangements in place for the Eco-Community fetters landowners ability to bring forward what could otherwise be acceptable land for development. Limiting appropriate development land to just those that are included as part of the Eco-Community promotional agreement/arrangements is unfair and unsound.

The concern is that small sites in Rackheath will not be deemed suitable for development by the District Council/GNDP unless they are included within the Rackheath Eco-Community landowner/promotional agreement/arrangements, which we understand is already in place. Any landowners not party to this agreement, including Paul Dunthorne will be unable to have their land considered suitable for development even if it meets all other sustainability considerations. This is a risk, given that the Eco Town programme is by no means certain.

Paul Dunthorne suggests that he should not be disadvantaged from bringing his site forward simply because he is not party to the Rackheath Eco-Community landowner/promotional agreement/arrangement. Paul Dunthorne considers that the decisions about which sites should be considered suitable for development in Rackheath should be based on their planning merits not whether they are included as part of the Eco-Community's landowner promotional agreement/arrangements. This lack of flexibility is unsound.

Paul Dunthorne also suggests that small sites within the Growth Triangle, including at Rackheath would help deliver some of the Broadland "small sites in the NPA" allowance (2,000 dwellings) expressed in Policy 9.

Statement of Focussed Changes (Joint Core Strategy)

O - 11833 - 8695 - FC9 - None

11833 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs R Munro [8695]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11836 - 8696 - FC9 - None

11836 Object

Focussed changes Policy 10

FC9

Respondent: Mr J Sims [8696]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

S - 11839 - 8697 - FC9 - None

11839 Support

Focussed changes Policy 10

FC9

Respondent: **Barratt Strategic (Mr David Banfield) [8697]**

Agent: **CGMS Ltd (Mr Richard Atkinson) [7681]**

Full Text:

Summary:

Statement of Focussed Changes (Joint Core Strategy)

O - 11841 - 8663 - FC9 - None

11841 Object

Focussed changes Policy 10

FC9

Respondent: Mr Arthur Self [8663]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11846 - 8698 - FC9 - None

11846 Object

Focussed changes Policy 10

FC9

Respondent: Jean Wills [8698]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11849 - 8699 - FC9 - None

11849 Object

Focussed changes Policy 10

FC9

Respondent: Mr Colin Wills [8699]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11852 - 6618 - FC9 - None

11852 Object

Focussed changes Policy 10

FC9

Respondent: Mr R.S. Lindsay [6618]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11855 - 8700 - FC9 - None

11855 Object

Focussed changes Policy 10

FC9

Respondent: C Drake [8700]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11859 - 8701 - FC9 - None

11859 Object

Focussed changes Policy 10

FC9

Respondent: Mr B Morgan [8701]

Agent: N/A

Full Text:

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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11862 - 8702 - FC9 - None

11862 Object

Focussed changes Policy 10

FC9

Respondent: Miss K Morgan [8702]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11865 - 8703 - FC9 - None

11865 Object

Focussed changes Policy 10

FC9

Respondent: J J Wyatt [8703]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11868 - 8704 - FC9 - None

11868 Object

Focussed changes Policy 10

FC9

Respondent: Mrs & Mrs B J Jones [8704]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11871 - 8705 - FC9 - None

11871 Object

Focussed changes Policy 10

FC9

Respondent: Mr M Wyatt [8705]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11874 - 8706 - FC9 - None

11874 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs C Harris [8706]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11880 - 8707 - FC9 - None

11880 Object

Focussed changes Policy 10

FC9

Respondent: J E P Watts [8707]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

S - 11889 - 8710 - FC9 - None

11889 Support

Focussed changes Policy 10

FC9

Respondent: Blue Living (David Copeland) [8710]

Agent: N/A

Full Text: It is in line with the way in which Blue Living works

Summary: It is in line with the way in which Blue Living works

Statement of Focussed Changes (Joint Core Strategy)

O - 11891 - 8711 - FC9 - None

11891 Object

Focussed changes Policy 10

FC9

Respondent: Ellen Powley [8711]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road

Statement of Focussed Changes (Joint Core Strategy)

O - 11895 - 8712 - FC9 - None

11895 Object

Focussed changes Policy 10

FC9

Respondent: Lorna Beckett [8712]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area

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Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

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Statement of Focussed Changes (Joint Core Strategy)

O - 11898 - 8713 - FC9 - None

11898 Object

Focussed changes Policy 10

FC9

Respondent: Mrs P Thorpe [8713]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11901 - 8714 - FC9 - None

11901 Object

Focussed changes Policy 10

FC9

Respondent: Mr R Thorpe [8714]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11904 - 8715 - FC9 - None

11904 Object

Focussed changes Policy 10

FC9

Respondent: Daniel Roper [8715]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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Statement of Focussed Changes (Joint Core Strategy)

O - 11907 - 8716 - FC9 - None

11907 Object

Focussed changes Policy 10

FC9

Respondent: Wm. P S Watts [8716]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11910 - 8717 - FC9 - None

11910 Object

Focussed changes Policy 10

FC9

Respondent: Stuart Richards [8717]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11913 - 8718 - FC9 - None

11913 Object

Focussed changes Policy 10

FC9

Respondent: S M Smith [8718]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11916 - 8719 - FC9 - None

11916 Object

Focussed changes Policy 10

FC9

Respondent: Mr J Rice [8719]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11919 - 8513 - FC9 - None

11919 Object

Focussed changes Policy 10

FC9

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11922 - 8720 - FC9 - None

11922 Object

Focussed changes Policy 10

FC9

Respondent: Howard Wyatt [8720]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11925 - 8721 - FC9 - None

11925 Object

Focussed changes Policy 10

FC9

Respondent: Tania Lean [8721]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11928 - 8722 - FC9 - None

11928 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs R A Pointer [8722]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11931 - 8657 - FC9 - i, ii, iii

11931 Object

Focussed changes Policy 10

FC9

Respondent: Mr Geoff Lyon (MTCP MRTPI) [8657]

Agent: N/A

Full Text: The proposed changes (FC9) are considered to be unsound for the following reasons:-

1. On 22 June 2010 Broadland District Council Cabinet considered that "following the election of the new Coalition Government there was uncertainty over a number of key policy areas including the growth agenda and therefore it seemed wise for the Council to take a step back and take stock until such time as the direction the new Government proposed to take became clear".
2. In light of the announced delays in relation to the Site Specific Proposals allocations by Broadland District Council, the proposed changes to FC8 are unjustified ahead of the full and proper consideration of the implications of change at National Policy level, particularly in respect of the growth agenda to meet the needs of the local community.
3. The proposed focused change unjustifiably and prematurely changes the status of the entire growth triangle area from one where development might be possible in principle in the future in certain locations and instead creates a single blanket site allocation for development without clearly stating whether such growth is deliverable, particularly in the light of potentially significant barriers to growth such as the uncertainty regarding the provision of the Northern Distributor Road (NDR) and other necessary infrastructure;
4. The proposal is inflexible in that it designates land in the growth triangle for potential development without first establishing whether such growth is deliverable or indeed represents the most appropriate strategy when considered against the reasonable alternatives, particularly in light of potential barriers to growth and the fact that there is no "Plan B";
5. The focused change is unsound because it will result in the entire growth triangle area falling within a newly created site allocation and result in an extended development boundary thus changing its status from predominantly one of restricted countryside designations to one where the principle of development would thereafter become acceptable;
6. Re-classifying the land in the manner proposed would open up all parts of the growth triangle to development ahead of Site Specific Allocations. This will put delivery of the key objectives of the Core Strategy at unnecessary risk as the area will be likely to be subject to piece-meal development proposals. This is likely to result in uncoordinated and poorly planned development coming forward ahead of a comprehensive masterplan being developed for the growth triangle area.
7. In summary, the proposed focus changes are neither justified, effective nor consistent with recent changes in national policy.

Summary: In summary, the proposed focus changes are neither justified, effective nor consistent with recent changes in national policy.

Statement of Focussed Changes (Joint Core Strategy)

O - 11935 - 8726 - FC9 - i, ii

11935 Object

Focussed changes Policy 10

FC9

Respondent: Persimmon/Hopkins Homes/Taylor Wimpey [8726] **Agent:** Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text: We support the need for coordination across the Growth Triangle and our clients have been working, and remain committed to working, with other landowners and the Councils to develop an approach to delivery. We consider that FC9 is unsound owing to the lack of clarity and the reference to a single co-ordinated approach. The policy also refers to detailed masterplanning for each quarter, but again it is unclear what is meant by each quarter. The first two sentences of FC9 are unnecessary.

Summary: We support the need for coordination across the Growth Triangle and our clients have been working, and remain committed to working, with other landowners and the Councils to develop an approach to delivery. We consider that FC9 is unsound owing to the lack of clarity and the reference to a single co-ordinated approach. The policy also refers to detailed masterplanning for each quarter, but again it is unclear what is meant by each quarter. The first two sentences of FC9 are unnecessary.

Statement of Focussed Changes (Joint Core Strategy)

O - 11941 - 8727 - FC9 - None

11941 Object

Focussed changes Policy 10

FC9

Respondent: Mr J Mayhew [8727]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11944 - 8728 - FC9 - None

11944 Object

Focussed changes Policy 10

FC9

Respondent: Mrs L Mayhew [8728]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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Statement of Focussed Changes (Joint Core Strategy)

O - 11947 - 8729 - FC9 - None

11947 Object

Focussed changes Policy 10

FC9

Respondent: C Baxter [8729]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11950 - 8730 - FC9 - None

11950 Object

Focussed changes Policy 10

FC9

Respondent: Mrs I Baxter [8730]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11953 - 8731 - FC9 - None

11953 Object

Focussed changes Policy 10

FC9

Respondent: G P Collins [8731]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11956 - 8732 - FC9 - None

11956 Object

Focussed changes Policy 10

FC9

Respondent: Mr D H Lean [8732]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11959 - 8733 - FC9 - None

11959 Object

Focussed changes Policy 10

FC9

Respondent: Lindsay Heard [8733]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11962 - 8734 - FC9 - None

11962 Object

Focussed changes Policy 10

FC9

Respondent: Mrs J Snelling [8734]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11966 - 8735 - FC9 - None

11966 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Daphne R Wyatt [8735]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11969 - 8736 - FC9 - None

11969 Object

Focussed changes Policy 10

FC9

Respondent: P Wyatt [8736]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11972 - 8737 - FC9 - None

11972 Object

Focussed changes Policy 10

FC9

Respondent: J B Granger [8737]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11975 - 8738 - FC9 - None

11975 Object

Focussed changes Policy 10

FC9

Respondent: Mrs C Granger [8738]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11978 - 8739 - FC9 - None

11978 Object

Focussed changes Policy 10

FC9

Respondent: Roy Durrant [8739]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11981 - 8740 - FC9 - None

11981 Object

Focussed changes Policy 10

FC9

Respondent: Neil Dobson [8740]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11991 - 8060 - FC9 - None

11991 Object

Focussed changes Policy 10

FC9

Respondent: Mr Peter Lanyon [8060]

Agent: N/A

Full Text:

Summary:

It fails to comply legally because the conduct of the public consultation in which it was presented to local communities backed the Aarhus Convention in manners that I shall make clear in due course. It is unsound because, by changing the growth triangle to Strategic Allocation from a Location, it would largely exclude over a long period of public participation in the development of the JCS. This flies in the face of Government announcements about community involvement in such matters. Having participated for six and a half years in an advisory body to the Ministry Of Defence on public consultation and participation in the ISOLUS Project, I have an insight into good and bad practice in public consultation that is directly relevant here, and that is not shared by anyone else I know who is involved in the JCS or the Focussed Changes.

I have already submitted my comments within the parameters you saw fit to require in your representations document. I am adding these comments both because I believe your restriction of comments to those parameters rendered the consultation unfit for purpose, and because I insist upon being allowed to submit my comments as and how I wish, provided they are relevant and civil. Please register me as an objector and acknowledge receipt of this letter, or show reason why it has not been accepted. My comments concern Replacement Policy 10 (FC8 and FC9) and Replacement of Appendix 5 (FC10). There is manifest bad faith in such a change of status, so late and during holiday times, from a Location of 1000s of horses in the North East Norwich Triangle to a Strategic Allocation, since it deprives the public of adequate participation in the decision-making process. Difficulty of access, technical complexity, and inadequate exposure of the Focussed Changes make the bad faith appear wilful rather than incompetent. A malign intention is apparent in the Change, because its effect would be to convert the Area Action Plan into a Supplementary Planning Document, that would enable the Authorities largely to evade public participation of the developments over a long period into the future. Antisocial and anti-environmental intentions are apparent in the inevitable effects on woodlands, open spaces and parklands in the Appended Map. The predication of all these plans and changed plans upon the proposed Northern Distributor Road ensures that they are all unsound, since the handling of that road by local authorities over the past several years has lacked the honesty and openness necessary in such planning processes.

Statement of Focussed Changes (Joint Core Strategy)

O - 11994 - 8747 - FC9 - None

11994 Object

Focussed changes Policy 10

FC9

Respondent: Miss C M Parrott [8747]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12000 - 8750 - FC9 - None

12000 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Anastasiou [8750]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

- i. Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii. Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

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* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12002 - 8749 - FC9 - None

12002 Object

Focussed changes Policy 10

FC9

Respondent: Mrs M Morgan [8749]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12005 - 8751 - FC9 - None

12005 Object

Focussed changes Policy 10

FC9

Respondent: Mr Anastasiou [8751]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during the period most councillors will be away on holiday.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12008 - 8752 - FC9 - None

12008 Object

Focussed changes Policy 10

FC9

Respondent: Alison Wright [8752]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12011 - 8753 - FC9 - None

12011 Object

Focussed changes Policy 10

FC9

Respondent: J E Townsend [8753]

Agent: N/A

Full Text:

Summary:

Herewith my formal object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12014 - 8754 - FC9 - None

12014 Object

Focussed changes Policy 10

FC9

Respondent: Mrs M Mobbs [8754]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12017 - 8755 - FC9 - None

12017 Object

Focussed changes Policy 10

FC9

Respondent: R J Hastings [8755]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12020 - 8756 - FC9 - None

12020 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs Roger & Janice Smith [8756]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

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* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12023 - 8757 - FC9 - None

12023 Object

Focussed changes Policy 10

FC9

Respondent: Barry John and Nicola Theobald [8757]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
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Statement of Focussed Changes (Joint Core Strategy)

O - 12026 - 8758 - FC9 - None

12026 Object

Focussed changes Policy 10

FC9

Respondent: Jeanette Rose [8758]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. Public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised but very badly advertised. Although the notice was put in the local press, many people do not take a daily newspaper and therefore would not be aware of any public meetings. No publicity was put in Salhouse and nothing was advertised at Jubilee Hall on the day, apart from the front door being left open!

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

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Statement of Focussed Changes (Joint Core Strategy)

O - 12029 - 8759 - FC9 - None

12029 Object

Focussed changes Policy 10

FC9

Respondent: Julia Yates [8759]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12033 - 8761 - FC9 - None

12033 Object

Focussed changes Policy 10

FC9

Respondent: Ms Judith Hurrell [8761]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12035 - 8760 - FC9 - None

12035 Object

Focussed changes Policy 10

FC9

Respondent: Mr A Birks and Miss N Cook [8760]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12038 - 8762 - FC9 - None

12038 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Patricia Hurrell [8762]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 12041 - 8763 - FC9 - None

12041 Object

Focussed changes Policy 10

FC9

Respondent: Sharon Ingram [8763]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12044 - 8764 - FC9 - None

12044 Object

Focussed changes Policy 10

FC9

Respondent: Mrs J Layton [8764]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12047 - 8765 - FC9 - None

12047 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs Gladwell [8765]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

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* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

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Statement of Focussed Changes (Joint Core Strategy)

O - 12050 - 8766 - FC9 - None

12050 Object

Focussed changes Policy 10

FC9

Respondent: Mrs C Hollidge [8766]

Agent: N/A

Full Text:

Summary:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12053 - 8767 - FC9 - None

12053 Object

Focussed changes Policy 10

FC9

Respondent: Mr Alan Samwell [8767]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parkland.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Please respond to this letter and include it in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12056 - 8087 - FC9 - None

12056 Object

Focussed changes Policy 10

FC9

Respondent: Miss Marguerite Finn [8087]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12059 - 8660 - FC9 - None

12059 Object

Focussed changes Policy 10

FC9

Respondent: Julie Wilson [8660]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

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* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12062 - 8768 - FC9 - None

12062 Object

Focussed changes Policy 10

FC9

Respondent: Mr Paul Osborne [8768]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

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* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12065 - 8769 - FC9 - None

12065 Object

Focussed changes Policy 10

FC9

Respondent: Jonathan Kemp [8769]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12068 - 8770 - FC9 - None

12068 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Julie Grimes [8770]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

1. Replacement Policy 10 (FC8 and FC9) Location for major new or expanded communities in Norwich Policy Area
2. Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement.

Please register me as an objector. In my view, the Focused Changes are unsound for the Following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in northeast Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised. I myself did not know about the policy's Numbered 1 and 2 above until this week and the closing date is the 30' August.

2. Re-labelling the north-east Norwich growth location as a Strategic Allocation to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'White space' within the growth triangle (ie land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses identified as having environmental constraints would have to be sacrificed to development, Or, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4 I object in principle to the purposed development of up to 10,000 based around a Norwich Northern Distributor Road to the north-east of Norwich. As well, as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham road and salhouse road.

It is about time we released that destroying woodland, common land were its been left to develop, nature takes its own course and wildlife has moved in Over many, many years its uniqueness should be cherish. These places should be left alone for us humans to enjoy as well as the wildlife. Once gone they will never be able to be copied for the next generation as so many other things can. Were will there children go to enjoy nature at its best see old giant trees capture there imaginations. Books, pictures, will he no sub torte for the real thing Were so lucky here in Norfolk to have these Lets Keep it that way.

Beautiful plaices for wildlife and the Mature Trees are not only providing food homes for these, There helping to clean are air. Yes, there going to plaint new saplings that yes absorb more carbon as they grow than mature trees but let us stop playing that excuse to get around cutting mature trees. In our grand children's life time they may never see the beauty of mature trees in there tall giant splendour until there 50 plus if we keep on cutting these trees down, the oak tree is now being threatened by

some bug like the elm so we are losing trees so cutting healthy ones own is just radicalises .

Statement of Focussed Changes (Joint Core Strategy)

O - 12071 - 8771 - FC9 - None

12071 Object

Focussed changes Policy 10

FC9

Respondent: Miss Jenny Morgan [8771]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12074 - 8310 - FC9 - None

12074 Object

Focussed changes Policy 10

FC9

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12089 - 8309 - FC9 - None

12089 Object

Focussed changes Policy 10

FC9

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary:

wish to formally object to the Focused Changes:

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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
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Statement of Focussed Changes (Joint Core Strategy)

O - 12092 - 8310 - FC9 - i, ii, iii

12092 Object

Focussed changes Policy 10

FC9

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [not supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12093 - 7971 - FC9 - i, ii, iii

12093 Object

Focussed changes Policy 10

FC9

Respondent: COLNEY PARISH MEETING (Dr Graham Martin)
[7971] Agent: N/A

Full Text:

Summary:

Ref. JCS FOCUSSED CHANGES REPRESENTATIO

Special reference to FC 9and FC10

This parish does not support the massive housing developments planned in the JCS as they are based on an out of date strategy and are unsustainable. The current changes do not address our concerns. We are especially concerned about the implications of FC 10.

We believe the JCS is NOT SOUND because its is not justified, not effective and not consistent with National Policy

We do not believe it is reasonable for the Council to take powers to exclude public involvement in the development of the Joint Core Strategy. This policy is an enabling document to create a Strategic Allocation which will be administered using a Supplementary Planning Document. The use of an SPD covering the entire Growth Triangle and for the whole of the period of this plan as a device to take total control of housing development and would set a precedent for housing development in the whole Greater Norwich Area. This is undemocratic. It is also in direct contravention to the stated aims of the government to give powers back to communities to decide how local planning should evolve. It will ignore Parish Plans and govern by dictat which is completely unacceptable. The Localism Bill which the Government announced after the election must be part of any consideration of Planning Policy for the future.

Yours sincerely,

Dr Graham Martin

Chairman

Colney Parish Meeting

Statement of Focussed Changes (Joint Core Strategy)

O - 12098 - 8777 - FC9 - None

12098 Object

Focussed changes Policy 10

FC9

Respondent: Mrs J A Watts [8777]

Agent: N/A

Full Text:

Summary:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12104 - 8309 - FC9 - i, ii, iii

12104 Object

Focussed changes Policy 10

FC9

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12112 - 8779 - FC9 - None

12112 Object

Focussed changes Policy 10

FC9

Respondent: Margaret Prime [8779]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. Also the use of top grade agricultural land being used for building when food for future generations will be so important. How stupid is this?

Statement of Focussed Changes (Joint Core Strategy)

O - 12117 - 8458 - FC9 - None

12117 Object

Focussed changes Policy 10

FC9

Respondent: Mr John Michael Evans [8458]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12120 - 8780 - FC9 - None

12120 Object

Focussed changes Policy 10

FC9

Respondent: Mr Eric Wise [8780]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the focused changes:

- i) Replacement Policy 10 (fc8 & fc9): Locations for major new or expanded communities in the Norwich Policy area.
- ii) Replacement appendix 5 (fc10) Old Catton, Sprowston, Rackheath, Thorpe St.Andrew Growth Triangle concept statement.

Please register me as an objector. In my view the focused changes are very unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed concept statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the North East Norwich growth location as a ' Strategic Allocation', to be followed up by a supplementary planning document rather than an area action plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the proposals map accompanying appendix 5 such as woodlands, open spaces and historic parklands.

The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having enviromental constraints) does not appear to have been assessed for its potential housing capacity.

I am concerned that the proposed number of new houses could not be accomodated within the white space and therefore either some land identified as having enviromental constraints would have to be sacrificed to development, or the proposed number of new builds would have to be scaled down.

THE JCS AND FOCUSED CHANGES DO NOT ADDRESS THIS IMPORTANT ISSUE.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Northern Distributor Road to the North East of Norwich.

As well as a loss of countryside a development on this scale will result in other adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road, also impacting heavily on other major roads to the east.

Statement of Focussed Changes (Joint Core Strategy)

O - 12123 - 8782 - FC9 - None

12123 Object

Focussed changes Policy 10

FC9

Respondent: Ms Thelma Berry [8782]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement. Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12126 - 8651 - FC9 - None

12126 Object

Focussed changes Policy 10

FC9

Respondent: Greg Townes [8651]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12129 - 8783 - FC9 - None

12129 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Linda Townes [8783]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12132 - 8784 - FC9 - None

12132 Object

Focussed changes Policy 10

FC9

Respondent: Mr Martin Thurlow [8784]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12135 - 8785 - FC9 - None

12135 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs Simon and Veronique Cornish [8785]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register US as objectorS. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12138 - 8786 - FC9 - None

12138 Object

Focussed changes Policy 10

FC9

Respondent: Mr Anthony Austwick [8786]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector.

In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road, Salhouse Road and the Plumstead Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12141 - 8787 - FC9 - None

12141 Object

Focussed changes Policy 10

FC9

Respondent: Prof Leslie H Sutcliffe [8787]

Agent: N/A

Full Text:

Summary:

Statement of Focused Changes - public consultation 19 July - 30 August

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12145 - 8790 - FC9 - None

12145 Object

Focussed changes Policy 10

FC9

Respondent: Mr Mark Gunton [8790]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12148 - 8789 - FC9 - None

12148 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs J P and H A Shanks [8789]

Agent: N/A

Full Text:

Summary:

We are very concerned by the fact that the public consultation period regarding the Focussed Changes to the Joint Core Strategy has been held during the holiday period. This has limited the opportunities for local views to be heard. Neither are we satisfied with the proposal to reclassify this area as a 'strategic allocation', which we believe would mean that future work could be progressed through a Supplementary Planning Document instead of a Area Action Plan. We understand that the effect of re-classification to an SPD would be that changes could be made to the Growth Triangle Plans without further public consultation. This, in our view, is undemocratic and improper. Whilst we appreciate the importance of meeting social needs, it is the massive scale of the growth, without the need for local consensus, which we find totally unacceptable. We have read local news accounts about our woodlands being considered for development. Local people feel desperate about this - for themselves and future generations - and we do not see how the so-called guardians of our county could have even considered this step. We strongly urge district councils to work with local people to find a better way forward. For example, by small-scale developments that support individual local needs and job opportunities; spread around the county and in areas where they exist. We have responded by letter rather than on the Representation Form, which appears too prescriptive, but trust that you will include this in the record of public responses.

Statement of Focussed Changes (Joint Core Strategy)

O - 12151 - 8792 - FC9 - None

12151 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Susan Simpson [8792]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12154 - 8793 - FC9 - None

12154 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs WJ Bateman [8793]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12158 - 8791 - FC9 - None

12158 Object

Focussed changes Policy 10

FC9

Respondent: M J Canfor [8791]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12160 - 8794 - FC9 - None

12160 Object

Focussed changes Policy 10

FC9

Respondent: Sarah Tetlow [8794]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector and acknowledge receipt of this letter. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12165 - 8795 - FC9 - None

12165 Object

Focussed changes Policy 10

FC9

Respondent: H Canfor [8795]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 12168 - 8796 - FC9 - None

12168 Object

Focussed changes Policy 10

FC9

Respondent: Michael Tetlow [8796]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector and acknowledge receipt of this letter. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12172 - 8797 - FC9 - None

12172 Object

Focussed changes Policy 10

FC9

Respondent: Mr and Mrs P Raven [8797]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector and acknowledge receipt of this letter. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12176 - 8799 - FC9 - None

12176 Object

Focussed changes Policy 10

FC9

Respondent: M D Absalom [8799]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12179 - 1781 - FC9 - None

12179 Object

Focussed changes Policy 10

FC9

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

1. This change in status is being introduced in haste without anyone being acquainted with the importance of the changes proposed change. Broadland District Council has referred to it as a 'wrapping-up' exercise. To produce a Concept Statement in this way does not address the vital matter of proper public consultation. This has not been done. No public meetings or exhibitions on the revised proposals have been undertaken in the affected areas.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is really not appropriate. Whilst it will speed up the Planning Process it is our view that the removal of the requirement for a public examination and concentration of the power within the District Council is unsound.

Statement of Focussed Changes (Joint Core Strategy)

O - 12182 - 7172 - FC9 - i, ii

12182 Object

Focussed changes Policy 10

FC9

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary: Appendix 5 Paragraph 1:

Not justified:

- no evidence to demonstrate whether there is sufficient land for up to 10,000 new dwellings and other types of development within the fixed boundaries of the growth triangle without encroaching on areas shown as environmental constraints in maps accompanying Appendix 5.

- no credible or robust evidence base to show that large scale road building near new development facilitates walking and cycling as principal modes. It goes without saying that such road building is likely to ensure that the private car is the preferred mode. This risks undermining the objectives and concept of the eco-town contrary to national policy to reduce reliance on the private car and to reduce the need to travel (PPG13, PPS1).

- no evidence to support the claim that the NDR is necessary for serving the extension for the reasons outlined in FC8 above (p. 6).

- no evidence to show how and to what extent the NDR facilitates public transport, walking and cycling. The County Council's Major Scheme Business Case for the NDR shows that in north Norwich, the NDR would reduce traffic flows by only 1.68% in the AM peak(5) and increase traffic by 0.04% in the PM peak. In contrast, evidence from the Department for Transport's Sustainable Travel Demonstration towns has shown that the delivery of an intensive programme of Smarter Choices reduces car trips by 9% and car mileage by 5%.

Appendix 5, Paragraph 10: is not effective as it is questionable whether a NDR can be delivered. It is also not justified as the most recent advice from Government to Norfolk County Council regarding the NDR states, "Local Authorities.... should not that assume schemes prioritised under the previous Government's Regional Funding Allocations (RFA) process will be funded to the previous published levels.We would therefore strongly advise you to minimize further development activity on this scheme ". (6)

Paragraph 10 is not effective on the basis that delivery of Postwick Hub is questionable. The most recent advice from Government to Norfolk County Council states:

"In view of the uncertainty over the availability of the funding for the scheme (ie Postwick Hub), it has been decided to defer, for the time being, the holding of a local inquiry. The way forward on this scheme should become clearer once the spending review is complete." (7)

Paragraph 10 is not justified as there is no credible evidence to show an NDR is part of the "baseline". Since it has not been built, the road cannot be considered as part of the baseline for the development strategy.

Paragraph 10 is Not Justified: There is no credible or robust evidence base to show that large scale road building facilitates walking and cycling as principal modes. Norfolk County Council has no committed plans to delivering any large scale changes in the reallocation of road space towards sustainable modes following the implementation of an NDR. Apart from a BRT route along Salhouse Road, the Proposals Map (Constraint and Opportunities, Appendix 5) shows no other sustainable transport infrastructure measures such as a bus lane along Wroxham Road and a strategic cycle network.

Paragraph 44: This is not justified as there is no clear evidence to show that the NDR is needed to solve the existing transport problems in Norwich.

Paragraphs 44- 47: By its own admission, the JCS shows that the development allocated in the growth triangle is almost certainly not deliverable as, it is claimed, it is entirely dependent on the NDR and/or the Postwick Hub improvements and there is significant uncertainty over the funding for both of these schemes. Here the JCS as a whole is shown not to be effective because the strategic allocation, on which rests the entire strategy, is not deliverable without the NDR. Indeed, the GNDP is clearly stating that without the NDR and Postwick Hub there can be no commitment to growth in the growth triangle. It raises the question as to where this growth will be going instead, but the JCS offers no alternative locations should this situation arise.

(5) NNTAG and CPRE assessment of NDR Major Scheme Business Case, December 2008. The need to free up road space is most pertinent during the peak periods. At other times there is ample capacity to reallocate road space

(6) Letter re NNDR from Dept. for Transport to Mike Jackson Norfolk County Council dated 10 June 2010.

(7) Letter from Government Office for East Midlands 2 August 2010 advising the Minister will hold a local inquiry into A47 Trunk Road (Postwick Interchange) Slip and Side Roads Orders.

Statement of Focussed Changes (Joint Core Strategy)

O - 12186 - 8798 - FC9 - None

12186 Object

Focussed changes Policy 10

FC9

Respondent: Diana Campbell [8798]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12190 - 8801 - FC9 - None

12190 Object

Focussed changes Policy 10

FC9

Respondent: Mr R J Halford [8801]

Agent: N/A

Full Text:

Summary:

Having just driven from Rackheath to Wroxham and observed once again the extreme pressure of traffic on the way into Hoveton, particularly at this time of year, even without any further housing development in the general area, I wish to formally object to the Focussed Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12197 - 8800 - FC9 - None

12197 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs Ray & Maureen Anderson [8800]

Agent: N/A

Full Text:

- Summary:**
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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12205 - 8804 - FC9 - None

12205 Object

Focussed changes Policy 10

FC9

Respondent: Roger and Julie Aspland [8804]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12208 - 8805 - FC9 - None

12208 Object

Focussed changes Policy 10

FC9

Respondent: Ms Hilary Howells [8805]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12213 - 8806 - FC9 - None

12213 Object

Focussed changes Policy 10

FC9

Respondent: Mr C S Spelman [8806]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12217 - 8807 - FC9 - None

12217 Object

Focussed changes Policy 10

FC9

Respondent: Nicolette Mary Richards [8807]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12222 - 8810 - FC9 - None

12222 Object

Focussed changes Policy 10

FC9

Respondent: Roger Dobson [8810]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12226 - 8812 - FC9 - None

12226 Object

Focussed changes Policy 10

FC9

Respondent: Christopher and Gaynor Peck [8812]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12233 - 8813 - FC9 - None

12233 Object

Focussed changes Policy 10

FC9

Respondent: Mr Jonathan Breed [8813]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

S - 12237 - 8057 - FC9 - None

12237 Support

Focussed changes Policy 10

FC9

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

Focussed change: Policy 10 Locations for major new, or expanded communities in the Norwich Policy Area
3. Focussed change: Appendix 5 Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Area Triangle Concept Statement. It is noted that the proposed change from the production of an Area Action Plan to the provision of a Supplementary Planning Document supported by a concept statement embeds the decision of Broadland District Council to follow this approach as set out in their adopted Local Development Scheme (December 2009). Whilst the Highways Agency has no objection in principle to this approach and accepts the need/desire for increasing housing growth rates, there is some concern that without careful planning, there is a danger that the area will be developed in a piece meal approach rather than taking a holistic view of the whole area and developing overall master planning and implementation policies which would then be subject to independent scrutiny. The Highways Agency has worked with Norfolk County Council on understanding the transport implications of growth in the Norwich area and contributed to the development of the evidence base. In conjunction with this significant work has been undertaken looking at the impacts of growth on the A47 Postwick Interchange and developing a junction scheme which would facilitate the delivery of the proposed Northern Distributor Route and enable delivery of local employment areas (e.g. Broadland Gate). The acceptable conclusions of that work were based on assumptions that the delivery of sustainable growth in the triangle area would significantly influenced by high modal shift away from travel by private car. If the area is developed on a piece meal approach then there is a high risk that sufficient levels of modal shift will not be achieved, the opportunities of economies of scale lost and the highway network will not be able to cope with potential future levels of traffic. Ultimately this could in the long term have a bearing on achieving planning consents for development towards the end of the plan period. Consequently, the Highways Agency's preference is to retain the concept of an Area Action Plan which will focus on the implementation and delivery of the whole area and developing area wide mechanisms which will be subject to independent scrutiny, i.e. the development of a managed process of delivery. If this approach is not taken and there is a more piece meal approach to delivery based on a Supplementary Planning Document, then it will be essential that the local planning authority in pressing forward with early delivery of growth considers at all times the implications of the 'bigger picture' and mechanisms are put in place to ensure this takes place in full consultation with strategic partners.

Statement of Focussed Changes (Joint Core Strategy)

O - 12244 - 8814 - FC9 - None

12244 Object

Focussed changes Policy 10

FC9

Respondent: Christopher Lawrence Hiscox [8814]

Agent: N/A

Full Text:

Summary:

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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12251 - 1823 - FC9 - None

12251 Object

Focussed changes Policy 10

FC9

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

1. This change in status is being introduced in haste without anyone being adequately apprised of the importance of the proposed changes. Broadland District Council has referred to it as a 'wrapping-up' exercise. To produce a Concept Statement in this way does not address the vital matter of proper public consultation. This has not been done. No public meetings or exhibitions on the revised proposals have been undertaken in the affected areas.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is really not appropriate. Whilst it will speed up the Planning Process it is our view that the removal of the requirement for a public examination and the concentration of power within the District Council is unsound.

Statement of Focussed Changes (Joint Core Strategy)

O - 12258 - 8047 - FC9 - None

12258 Object

Focussed changes Policy 10

FC9

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary:

1. This change in status is being introduced in haste without anyone being acquainted with the importance of the changes proposed change. Broadland District Council has referred to it as a 'wrapping-up' exercise. To produce a Concept Statement in this way does not address the vital matter of proper public consultation. This has not been done. No public meetings or exhibitions on the revised proposals have been undertaken in the affected areas.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is really not appropriate. Whilst it will speed up the Planning Process it is our view that the removal of the requirement for a public examination and concentration of the power within the District Council is unsound.

Statement of Focussed Changes (Joint Core Strategy)

O - 12262 - 8821 - FC9 - None

12262 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs Frank & Karen Reding [8821]

Agent: N/A

Full Text:

Summary:

We wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew
Growth Triangle Concept Statement Please register us as objectors. In our view the Focused Changes are unsound for the following

reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in northeast Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. We are concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. We are concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. We object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12265 - 8822 - FC9 - None

12265 Object

Focussed changes Policy 10

FC9

Respondent: Mr Nicholas Wiltshire [8822]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12268 - 8820 - FC9 - None

12268 Object

Focussed changes Policy 10

FC9

Respondent: Simon Kett [8820]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12271 - 8823 - FC9 - None

12271 Object

Focussed changes Policy 10

FC9

Respondent: Mr Greg Insull [8823]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement.

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation'

has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the

Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to

have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as

having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major

traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12298 - 8589 - FC9 - i, ii, iii

12298 Object

Focussed changes Policy 10

FC9

Respondent: SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589] **Agent:** N/A

Full Text:

Summary:

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It is has yet to be considered by the GNDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

Policy FC9 Growth Triangle

1. This change is being introduced without informing the public of the significance of the changes proposed. The explanation in the consultation makes no reference to the consequences of designating this differently under an alternative planning regime. Broadland District Council has referred to it as a 'wrapping-up' exercise. To produce a Concept Statement in this way does not address the vital matter of proper public consultation. No public meetings or exhibitions on the revised proposals have been undertaken in the affected areas.
2. Only Broadland District Council is proposing to introduce this methodology.
3. Re-labelling the northeast Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is really not appropriate. Whilst it may speed up the Planning Process, the removal of the requirement for a public examination and concentration of the power within the executive of the District Council is unsound.

Statement of Focussed Changes (Joint Core Strategy)

O - 12301 - 8835 - FC9 - None

12301 Object

Focussed changes Policy 10

FC9

Respondent: Wroxham Parish Plan Group (R B Colman) [8835] **Agent:** N/A

Full Text:

Summary:

I write on behalf of the Wroxham Parish Plan Group. The Group was formed under the auspices of the Wroxham Parish Council in line with the Government initiative to encourage village communities to have their say on matters affecting the village. As usual in the initiative the opinion of each household on a wide range of issues was gleaned by means of a questionnaire. We undertook the questionnaire survey in the spring of this year. We have a response from 443 households out of a total of 654 primary residences (second homes and holiday lets being discounted). This response reflects a 68% return, compared with 65% in the recent general election. We therefore consider that we have a mandate to speak for the whole Village.

The answers to a number of questions relevant to your enquiry were:

Q39 Wroxham is designated as a Key Service Centre in the proposed Joint Core Strategy for Greater Norwich. It is proposed that it is therefore suitable to receive 200-300 new dwellings between now and 2026. Is Wroxham well placed to cope with this development?

Yes 49 No 343

Q40 is the existing village infra-structure able to support the development of 200-300 extra houses

Yes 35 No 352

Q41 Does anyone in your household need their own housing in Wroxham?

Yes 35 No 381

Q43 Do you know anyone who has had to move away from Wroxham because they could not find housing locally that they could afford?

Yes 57 No 330

Q46 Are you in agreement with the intended Eco town in Rackheath?

Yes 80 No 304

Q47 Are you in agreement with the proposed conference and tourist development in Salhouse?

Yes 79 No 225

We urge you to take the views of a community such as ours into account in your deliberations.

Statement of Focussed Changes (Joint Core Strategy)

O - 12309 - 8837 - FC9 - None

12309 Object

Focussed changes Policy 10

FC9

Respondent: L Stavridis [8837]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector and acknowledge receipt of this latter. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12312 - 8838 - FC9 - None

12312 Object

Focussed changes Policy 10

FC9

Respondent: Mr Jason Michael Hollidge [8838]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12316 - 8840 - FC9 - None

12316 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs Sue and Graham Bergin [8840]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12325 - 8687 - FC9 - None

12325 Object

Focussed changes Policy 10

FC9

Respondent: Mr John Allaway [8687]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12326 - 8708 - FC9 - None

12326 Object

Focussed changes Policy 10

FC9

Respondent: Mrs Ann Moy [8708]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12330 - 8844 - FC9 - None

12330 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs R.J & E.M Saunders [8844]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12333 - 8845 - FC9 - None

12333 Object

Focussed changes Policy 10

FC9

Respondent: Mr & Mrs David George [8845]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11744 - 8665 - FC10 - i, ii, iii

11744 Object

Focussed changes Appendix 5

FC10

Respondent: Nicola Kerr [8665]

Agent: N/A

Full Text:

I find the plan most disturbing. The "Growth Triangle" implies a level of development which is inconsistent with the current landscape and, since it encompasses significant areas of historic parkland, is unsuitable for the development of residential, workplace and roads.

The document identifies 'constraints' which quite properly regulate and limit the amount of development which may take place in areas of historic parkland and ancient woodland, but seem to imply that this will be available as green spaces for local communities; at present these lands are in private ownership. This is a rural community and this development is unwelcome.

The views of the local community have not been taken into account. The route for the NDR was changed after submissions had been made, to a new route which had not been consulted on at all.

My postcode (NR13 6LP) was not included in the original survey on the NDR because (I was told) the postcodes used were 'probably out of date' and did not include 'new developments' (I moved in in 2001 and most of my neighbours beforehand, ie several years before).

I was not sent any documents on the ecotown which identified it's location or invited me to comment by the authorities. I heard more on Radio 4's 'Today' programme and in the local newsletter.

It is not appropriate to build the NDR on the route proposed as it is too far out from Norwich and will encourage 'in fill' building on land which has historically been rural land, which is contrary to national policy. The infrastructure is insufficient for such a large development. It is not taking into account adequately the ancient woodlands and parkland, which should not be threatened by development.

Moreover, this on line consultation is confusing. I am asked to tick boxes saying 'justified' 'effective' and 'consistent with national policy' whereas, for the avoidance of doubt, I feel the contrary. I had to call the helpline for assistance, but I am sure a number of other people wishing to comment will also have been confused, which is a poor approach to consultation as others may have been deterred from submitting their views.

Moreover, in the current economic climate I think it is unacceptable to pursue this strategy. And a waste of money not to shelve it immediately.

Summary:

Inadequate consultation, including change of route for the NDR after the consultation.
NDR too far out, encouraging in fill building, contrary to national policy
Insufficient regard for historic parklands and ancient woodland.
Postcodes omitted from original NDR consultation
Suspension of current plans to consult due to funding uncertainties.
Inadequate assessment of funding requirements.

Statement of Focussed Changes (Joint Core Strategy)

O - 11745 - 8606 - FC10 - None

11745 Object

Focussed changes Appendix 5

FC10

Respondent: Sara Beaven [8606]

Agent: N/A

Full Text:

Summary:

Policy 10 - appendix5 Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.
- 5 I also object to the timing of the consultation period which has been scheduled over the summer holidays where people are less likely to be able to respond and where local Parish Councils are not meeting in August. In fact some councils have been unable to convene to discuss this and make any representation to the strategy. This is undemocratic and should be rescheduled or the time allowed to object extended to allow a proper and democratic response.

Statement of Focussed Changes (Joint Core Strategy)

O - 11747 - 8513 - FC10 - None

11747 Object

Focussed changes Appendix 5

FC10

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary:

Once again I wish to state my strong opposition to the Joint Core Strategy which involved a flawed consultation. In view of the large change in circumstances as well as a new Government I believe that the entire Joint Core Strategy should now be withdrawn until the new housing figures and details of the Government spending review are known.

To proceed any further without these new details would be a waste of public money.

Statement of Focussed Changes (Joint Core Strategy)

S - 11753 - 8668 - FC10 - None

11753 Support

Focussed changes Appendix 5

FC10

Respondent: National Grid (Bethany Tucker) [8668]

Agent: N/A

Full Text:

Summary:

Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:

Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties

http://www.nationalgrid.com/NR/rdonlyres/50ACAC0A-ED26-41A7-91FA-83163A98270F/23790/TSPSSW22_J537_Rev0807.pdf

Gas Transmission Underground Pipelines - Guidance

http://www.nationalgrid.com/NR/rdonlyres/446009BF-ABB5-42E1-B9FE-44E90D577DD5/18653/APTGasGuidance_2_.pdf

Statement of Focussed Changes (Joint Core Strategy)

O - 11754 - 934 - FC10 - ii

11754 Object

Focussed changes Appendix 5

FC10

Respondent: Natural England (Ms Helen Ward) [934]

Agent: N/A

Full Text:

Summary:

Natural England supports the concept of more detailed master-planning for the north east sector of Norwich through the production of a Supplementary Planning Document. However, there are overarching areas of uncertainty which need to be resolved at the Joint Core Strategy stage before this document is finalised.

Applying the definition of 'sound' given above (fit for purpose, showing good judgement, able to be trusted), we are specifically concerned about the reliance of the whole policy on the unsecured provision of the Northern Distributor Road, as set out in points 44 and 46. While such uncertainty remains, the Statement of Focussed Changes affirms that 'there cannot be commitment to large-scale development in the growth triangle' (page 22), which is the driver of FC10. It is difficult to see how this tallies with the 'sound infrastructure delivery planning' required to render the plan effective, as set out in your guidance notes below. It would be helpful to provide an assessment of the strategy for delivering growth within the triangle if the NDR does not receive the requisite funding to go ahead. If development of this area is only sustainable with the provision of the NDR, and the timeframe for delivery of the NDR is unconfirmed, there should be an alternative approach to master-planning for the north east sector.

Point 6 (page 11) - as well as Racecourse Plantation, reference should also be made under this point to County Wildlife Sites 2042: Belmore & Brown's Plantations, and 1392: Paine's Yard Wood, The Owlery and March Covert.

Point 7 (page 11) - as elsewhere within the GNDP area, we would argue that another 'key issue' for the Appropriate Assessment is water quality. Please amend the reference to increased visitor pressure having an adverse effect (i.e. disturbance) on 'habitats' to read 'species'. Unlike coastal habitats, the Broads are not especially sensitive to direct pressure through trampling of vegetation, but there is a risk of breeding and over-wintering birds being displaced from their grounds.

Point 14 (page 13) - utility constraints - We note the constraint that the existing strategic sewer has capacity for an additional 4000 homes (presumably this would include homes elsewhere in Norwich outside the growth triangle). However, we do not consider that the phrase 'adequate time for necessary reinforcements to be programmed' fully addresses the plan's need for 'sound infrastructure delivery planning'. A more strategic approach to sewerage provision would also be needed to satisfy the requirements of the Habitats Regulations and ensure a conclusion of no adverse effect on internationally designated sites. This raises a question over the test of soundness (effectiveness), as set out in your guidance notes below - requiring 'delivery partners who are signed up to it'. A commitment is required from Anglian Water that future growth would be served by adequate infrastructure provision.

We strongly support the vision set out on page 13 for a 'multi-functional network of greenspaces and green links', which are required to mitigate for, and sustain, the planned growth. Natural England advocates the Accessible Natural Greenspace Standards (ANGSt), and has produced a guidance document - Nature Nearby (March 2010) - which can be downloaded from our website: www.naturalengland.org.uk. A recent Natural England report - Analysis of Accessible Natural Greenspace Provision for Norfolk (June 2010) - has shown that the Broadland District Council area has 0% of its households currently meeting the combined ANGSt target, and 23.4% households meeting none of the ANGSt targets. There is, therefore, clearly a need for additional green infrastructure provision to serve the existing population, and even greater pressure on existing assets from future growth proposals.

Point 18 - landscape structure. We note, on page 16, the stated importance of protecting 'existing important assets', including County Wildlife Sites. Although this may be the plan policy, we are aware that planning applications coming forward pre-adoption do not place the same emphasis on the protection of these assets and - if the plan is relying on their existence to maintain landscape structure/green linkages - their long-term security is not guaranteed. The 'extensive network of connected spaces', formed of Brown's, Belmore and Racecourse Plantations is already subject to development pressure, so additional assets may need to be identified/created.

Point 20 - although multi-functionality should be the aspiration of new greenspace provision, it must also be recognised that some land uses are mutually exclusive and it is important to safeguard appropriate areas for biodiversity benefit, where the needs of wildlife are prioritised.

Point 33 - we fully endorse the assumption that all opportunities to exceed the minimum open space provision must be taken, not at the expense of reductions in provision elsewhere.

Point 43 - we feel that this is where more robust wording is required to link the phasing of development to the provision of the requisite infrastructure, in terms of water supply, waste-water disposal and green infrastructure. It should be made explicit that no additional growth will pre-empt the provision of these essential services, as elsewhere in the Joint Core Strategy.

Statement of Focussed Changes (Joint Core Strategy)

O - 11755 - 7738 - FC10 - None

11755 Object

Focussed changes Appendix 5

FC10

Respondent: Anglian Water (Mrs Sue Bull) [7738]

Agent: N/A

Full Text:

Summary: Thank you for the opportunity to comment on the proposed changes.

Item 14. - page 13.

"Initial transfer to Whitlingham would be possible utilising an existing strategic sewer with capacity for 4000 houses above current commitments"

We do not currently have capacity for 4000 properties within existing sewers above current commitments. Minor network infrastructure upgrades will be required to accommodate the initial 200 property exemplar phase but significant upgrades will be required to accommodate the remainder of the 4000 properties. The Water Cycle Study planned for the Eco-Community will identify and address these issues. Whitlingham WwTW does have the required treatment capacity to accommodate the full proposed allocation but it is the network infrastructure which will be required to be upgraded.

Please amend this sentence to reflect the above.

Do not hesitate to contact me should you wish to discuss.

Statement of Focussed Changes (Joint Core Strategy)

O - 11758 - 8670 - FC10 - None

11758 Object

Focussed changes Appendix 5

FC10

Respondent: Dr Lorraine Maitland [8670]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11761 - 8672 - FC10 - None

11761 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Peter Moy [8672]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road, Salhouse Road and Plumstead Road East - non of which are suitable for widening within the 'built-up area'.

Statement of Focussed Changes (Joint Core Strategy)

O - 11764 - 8673 - FC10 - None

11764 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Ian Muller [8673]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11767 - 8674 - FC10 - None

11767 Object

Focussed changes Appendix 5

FC10

Respondent: Carl & Diana Wainwright [8674]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11770 - 8675 - FC10 - None

11770 Object

Focussed changes Appendix 5

FC10

Respondent: Nichola Cable & Aaron Joyce [8675]

Agent: N/A

Full Text:

Summary: We wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area.
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement.

Please register us both as objectors. In our view the Focused Changes are unsound for the following reasons: -

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage, with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. We are concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5, such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. We are concerned that the proposed number of new houses cannot be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed for development OR the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this very important issue.
4. We object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as a considerable loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11773 - 8676 - FC10 - None

11773 Object

Focussed changes Appendix 5

FC10

Respondent: C Hipperson [8676]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11778 - 8677 - FC10 - None

11778 Object

Focussed changes Appendix 5

FC10

Respondent: R Newton [8677]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11781 - 8678 - FC10 - None

11781 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs R C Burton [8678]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11784 - 8679 - FC10 - None

11784 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs P W Dade [8679]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11787 - 8680 - FC10 - None

11787 Object

Focussed changes Appendix 5

FC10

Respondent: John Tink and Janet Mann [8680]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11790 - 8681 - FC10 - None

11790 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs and Mr Julie and Simon Hunt [8681]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11793 - 8682 - FC10 - None

11793 Object

Focussed changes Appendix 5

FC10

Respondent: Marie Smithson [8682]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11796 - 8683 - FC10 - None

11796 Object

Focussed changes Appendix 5

FC10

Respondent: Ray, Olive and Simon Halliday [8683]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11799 - 8684 - FC10 - None

11799 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs E Wickham [8684]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11803 - 8685 - FC10 - None

11803 Object

Focussed changes Appendix 5

FC10

Respondent: Joan Middleton [8685]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11806 - 8686 - FC10 - None

11806 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs P Hardie [8686]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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We need to be far more self sufficient in food production, therefore NO development on our farmland.

Statement of Focussed Changes (Joint Core Strategy)

O - 11807 - 8687 - FC10 - None

11807 Object

Focussed changes Appendix 5

FC10

Respondent: Mr John Allaway [8687]

Agent: N/A

Full Text:

Summary:

Policy 10 - Appendix 5

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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11811 - 8688 - FC10 - None

11811 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Clive Keable [8688]

Agent: N/A

Full Text:

Summary:

ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11813 - 8689 - FC10 - None

11813 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Jennie Layton [8689]

Agent: N/A

Full Text:

Summary:

I strongly resist any proposals to build housing on Thorpe Woodlands. i am speaking on behalf of my family and especially my mother whose bungalow borders Belmore Plantation on Booty Road. This is unique woodland rich in wild life and which has been an integral part of childhood and adult experience. To destroy areas of natural beauty and to replace this with incongruous housing, would, I feel, be a devastating loss to the local area. We do not need extra housing here and our future generations deserve a legacy of green wild space to enrich our lives. I walk in these woods every day and greatly appreciate the Gurney family's co-operation in allowing this. The woodlands need to be treasured and preserved to maintain psychological well being for all the visitors and for children to learn and appreciate healthy and cosiderate respect within our dwindling open spaces. Please leave the woods alone and take construction to areas of minimal landscape damage away from the leafy and historical environment of Thorpe St. Andrew.

Statement of Focussed Changes (Joint Core Strategy)

O - 11814 - 8691 - FC10 - None

11814 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Patricia Hurrell [8691]

Agent: N/A

Full Text:

Summary:

I strongly resist any proposals to build housing on Thorpe Woodlands. i am speaking on behalf of my family and especially my mother whose bungalow borders Belmore Plantation on Booty Road. This is unique woodland rich in wild life and which has been an integral part of childhood and adult experience. To destroy areas of natural beauty and to replace this with incongruous housing, would, I feel, be a devastating loss to the local area. We do not need extra housing here and our future generations deserve a legacy of green wild space to enrich our lives. I walk in these woods every day and greatly appreciate the Gurney family's co-operation in allowing this. The woodlands need to be treasured and preserved to maintain psychological well being for all the visitors and for children to learn and appreciate healthy and cosiderate respect within our dwindling open spaces. Please leave the woods alone and take construction to areas of minimal landscape damage away from the leafy and historical environment of Thorpe St. Andrew.

Statement of Focussed Changes (Joint Core Strategy)

O - 11815 - 8692 - FC10 - i, iii

11815 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Christopher Humphrey [8692]

Agent: N/A

Full Text:

Summary:

I believe FC10 Appendix 5; The concept statement is neither legally compliant nor consistent with National Policy as:

(a) It does not comply with the governments green paper; Open source Planning in which it is made clear the plan should be established as a result of what the local people say they need. Where public exhibitions have been held they have been to advise the public what they will be getting after a plan has been established, rather than to genuinely gather information about what the locals want. Latterly even these public exhibitions have been postponed or cancelled, the opposite to the commitment to localism and empowering local communities that we were promised by the government.

(b) The entire strategy was established to meet sceptical housing targets set by the now revoked Regional Spatial Strategies. The Secretary of State Eric Pickles said on the 6 July planning committees could no longer hide behind these targets, yet it appears this strategy continues to do so.

I also believe the strategy is unsound and parts cannot be justified because:

(a) Location. The 3 main access roads to the Norwich area, the A11 from Cambridge area, the A140 from the Ipswich area and the A47 from the Peterborough, Kings Lynn area all access the Southern Bypass. It is therefore logical to build on that side of Norwich so residents can travel to those other areas without going through Norwich. To plan to build 10000 houses in an area that as well as accessing the Norfolk Broads and other special areas of conservation on the north east corner of Norwich means that access to daily needs such as the University of East Anglia (UEA), and the only major hospital in the area Norfolk and Norwich University Hospital will not be easy, although if the main growth area was located in the opposite quadrant, to the south west of Norwich, these daily needs and main roads would be easily accessible.

(b) Housing requirements. The "questionable" Regional Spatial Strategies housing targets suggests a need for housing largely based on figures from previous registers but all that proves is that dwellings were available for people to take, and it is feasible that rapidly rising growth here is because more development has already taken place in these areas than other adjacent areas. It also quotes a resurgence in the housing market, there is of course no evidence of any resurgence and at present there are many houses for sale within the proposed "growth triangle". If resurgence does eventually arrive, it is an undisputable fact that most people if given the option would prefer not to buy a property near an airport, so it is likely that the resurgence will hit other areas to the south of Norwich first if there are houses available there. Building at the western end of this growth area also stifles any possible future growth of the International Airport and its safety/noise zones, which in years to come has to be a possible requirement even if growth is only at a third of the rates quoted.

(c) Transport Strategy. The NNDR is quoted as being the base line for the development strategy, however, this is unlikely to affect the majority of increasing daily commuter traffic as it is basically another radial bypass, which although ideal for heavy through traffic, local traffic such as commuters seem not to use. E.g. when I have taken taxi to the airport from Thorpe End or Thorpe St Andrew, direct routes along "rat runs" through housing estates have been taken as it is quicker and less mileage than using the A1042/A140 ring road. Commuters do the same, presently despite being totally unsuitable for the amount of traffic; Green Lane is used to access the Broadland business park. Direct routes such as the link road promised many years ago due to the growth of the Broadland Business Park would be a more suitable priority and under the present threat of spending cut a more achievable objective. Alternatively spend any money on the duelling of the A11 which would benefit all the businesses in this area.

(d) Employment. Significant employment prospects at the Broadland Business Park and Broadland Gate are constantly being referred to, however both of those sites have direct access to the Southern Bypass, so there is no requirement to build a vast development in this area to provide manpower for it, in fact if development was off the southern bypass the main access roads are in place. A link road to join the Business Park and the development at Sprowston would of course alleviate "rat runs" on unsuitable roads, and would also assist the dispersal of the present employment traffic at Rackheath. Only other minor modifications are required, to cater for both the employment and the highway needs.

(e) Accuracy. I believe the plan shows an incomplete picture. Whilst proposed expansion of the business park is shown, there is no indication of the 600 dwellings quoted in planning application 20090886 which I understood went hand in hand. The plan also frequently refers to the "eco-town" at Rackheath, despite Greg Shapps the Minister for Housing stating "before releasing funding for eco-towns, he wants to ensure that each scheme has the support of the wider community" which of course is not the situation we have here, so hopefully will not go ahead in its present form. The prospect of further cuts in the October review mean that previous funding allocations for the NNDR and the Poswick hub may also be withdrawn or at least postponed, so no clear accurate picture can be portrayed and as the strategy shows no alternatives, many areas of the strategy may have to be fully reassessed. It is therefore suggested that the entire strategy be looked at again, with the local communities being involved throughout.

Statement of Focussed Changes (Joint Core Strategy)

O - 11823 - 8693 - FC10 - None

11823 Object

Focussed changes Appendix 5

FC10

Respondent: John & Janice Waters [8693]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11827 - 8216 - FC10 - ii

11827 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Paul Dunthorne [8216]

Agent: Bidwells Norwich (309) (Mr John Long) [8211]

Full Text:

Summary: Paul Dunthorne considers JCS Focussed Change 10 (FC10) to be unsound on the basis that it results in an inflexible policy and therefore fails the Effectiveness soundness test. This representation is also relevant to FC9 .

Reasons:

Paul Dunthorne representations on Focussed Change FC 9 suggest that JCS Policy 10 needs to have flexibility built into it to allow small sites and non-strategic development to come forward at Rackheath, where it would not prejudice the ability of the Rackheath Eco-Community to be delivered or in the event that the Government cancel's the Eco Towns programme. If accepted, the changes to Policy 10, need consequential changes to Appendix 5 (FC10).

Statement of Focussed Changes (Joint Core Strategy)

O - 11830 - 8694 - FC10 - None

11830 Object

Focussed changes Appendix 5

FC10

Respondent: F Jeans [8694]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11834 - 8695 - FC10 - None

11834 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs R Munro [8695]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11837 - 8696 - FC10 - None

11837 Object

Focussed changes Appendix 5

FC10

Respondent: Mr J Sims [8696]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11842 - 8663 - FC10 - None

11842 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Arthur Self [8663]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

S - 11843 - 8697 - FC10 - None

11843 Support

Focussed changes Appendix 5

FC10

Respondent: Barratt Strategic (Mr David Banfield) [8697]

Agent: CGMS Ltd (Mr Richard Atkinson) [7681]

Full Text:

Summary:

One element of the proposed Concept Statement with which we take issue is the proposal in paragraph 47 that "any development beyond existing planning permissions and allocations and an exemplar scheme at Rackheath would be dependent on the provision of [an orbital link between Sprowston fringe and Broadland business park]". Given that we would have no control over the provision of such a link, which we believe would have to be delivered by the developer of land in that area, this could effectively block any significant development of the Eco-Community or at the very least pose unacceptable constraints on our bringing forward the development, which all agree is essential to delivering the housing numbers for the Greater Norwich area. Furthermore, the wording of the paragraph is such that the link would be required even if the Northern Distributor Road were in place, which clearly could not be justified in traffic terms. Such a link would not be required to facilitate the public transport strategy for Rackheath and we do not believe that it would be essential to manage the limited private traffic movements from Rackheath Eco-Community.

I understand, having discussed this matter with your colleagues, that the intention of the statement was to indicate that the orbital link was one example of highways infrastructure which may be required to service development in parts of the Growth Triangle, but that it should not necessarily be a pre-requisite of development at Rackheath beyond the exemplar scheme. This would be more logical and I trust that you will take the opportunity to address the ambiguity in advance of (or during) the Examination.

We would be keen to discuss further the matter with you/the highway authority.

Statement of Focussed Changes (Joint Core Strategy)

O - 11847 - 8698 - FC10 - None

11847 Object

Focussed changes Appendix 5

FC10

Respondent: Jean Wills [8698]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11850 - 8699 - FC10 - None

11850 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Colin Wills [8699]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11853 - 6618 - FC10 - None

11853 Object

Focussed changes Appendix 5

FC10

Respondent: Mr R.S. Lindsay [6618]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11857 - 8700 - FC10 - None

11857 Object

Focussed changes Appendix 5

FC10

Respondent: C Drake [8700]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11860 - 8701 - FC10 - None

11860 Object

Focussed changes Appendix 5

FC10

Respondent: Mr B Morgan [8701]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11863 - 8702 - FC10 - None

11863 Object

Focussed changes Appendix 5

FC10

Respondent: Miss K Morgan [8702]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11866 - 8703 - FC10 - None

11866 Object

Focussed changes Appendix 5

FC10

Respondent: J J Wyatt [8703]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 11869 - 8704 - FC10 - None

11869 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs & Mrs B J Jones [8704]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11872 - 8705 - FC10 - None

11872 Object

Focussed changes Appendix 5

FC10

Respondent: Mr M Wyatt [8705]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11875 - 8706 - FC10 - None

11875 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs C Harris [8706]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11881 - 8707 - FC10 - None

11881 Object

Focussed changes Appendix 5

FC10

Respondent: J E P Watts [8707]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11892 - 8711 - FC10 - None

11892 Object

Focussed changes Appendix 5

FC10

Respondent: Ellen Powley [8711]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road

Statement of Focussed Changes (Joint Core Strategy)

S - 11894 - 8710 - FC10 - None

11894 Support

Focussed changes Appendix 5

FC10

Respondent: Blue Living (David Copeland) [8710]

Agent: N/A

Full Text: Blue Living generally supports the concept statement except in the following regards wher it would wish to reserve its position pending discussions to ascertain clarity at the EiP:

* Generally we welcome the strategic allocation, the concept statement and the masterplanning process that it will entail via a SPD. There are, however, some strictures within what is proposed which without further clarification we would not necessarily agree e.g. the relationship to be spelled out between the 'framework plan' (who does it, how is it defined, its legal status, who owns it and so on) and the 'daughter masterplans' to be provided by developers.

* We would want to be clearer on the scale and purpose of yet another Sustainability Appraisal and whatever constitutes a Health Impact Assessment and who is to pay for them and who is to be appointed to produce them

* The way in which Rackheath is portrayed as the ultimate to be achieved as both a community and a place, which is implicit in the document, is inappropriate. All of the development in the growth triangle should be seeking to attain levels of quality hitherto unseen in the East of England and there should be no difference in the way its constituent parts are treated

What is the evidence that 2,000 units is the maximum that can be developed without the NDR? If such evidence exists, what assumptions about location, form and trip generation does it make and have these been thoroughly challenged and explored, and if so where? If not, any cap is arbitrary

* We are not convinced by the distribution of employment land. In the period to 2026 we can at least expect a different approach to economic activity which will underpin different - and much more flexible - patterns of activity. Since location of employment relative to homes is the principal generator of peak traffic a flexible approach which allows maximum integration of homes and workplaces will be essential to underpinning growth especialt if the NDR does not happen or is substantially delayed.

* Similarly we are not convinced that, without much stronger evidence, remarks about the priority in which housing types will be delivered is sensible. The passing remark about the early phases will be dominated by family housing should be challenged - this should be a matter for a SPD to address on the basis of the then applicable evidence

* We welcome the insistence on green infrastructure provision of all kinds but would ask for a little less hard line constraining of development close to or even in historic parkland

* It has to be said that until the IDP is published the whole infrastructure question is and will remain a massive issue. There are statements about liquid waste treatment for example which do not appear to be properly founded and need to be underpinned by estimates of scale and potential cost

Summary: The following issues need to be addressed:

The relationship between different types (and scales) of plans

The nature, detail and purpose of all future appraisals and assessments - how many are really needed?

Is Rackheath rally so much of an exemplar at this embryonic stage?

Evidence underpinning 2000 units if there are problems with the NDR

Employment land distribution

Housing types are specified with proper evidence and done too early

Effects of dev elopment on historic parkland is too hard-line

Infrastructure still needs greater definition

Statement of Focussed Changes (Joint Core Strategy)

O - 11896 - 8712 - FC10 - None

11896 Object

Focussed changes Appendix 5

FC10

Respondent: Lorna Beckett [8712]

Agent: N/A

Full Text:

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2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11899 - 8713 - FC10 - None

11899 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs P Thorpe [8713]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11902 - 8714 - FC10 - None

11902 Object

Focussed changes Appendix 5

FC10

Respondent: Mr R Thorpe [8714]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11905 - 8715 - FC10 - None

11905 Object

Focussed changes Appendix 5

FC10

Respondent: Daniel Roper [8715]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11908 - 8716 - FC10 - None

11908 Object

Focussed changes Appendix 5

FC10

Respondent: Wm. P S Watts [8716]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11911 - 8717 - FC10 - None

11911 Object

Focussed changes Appendix 5

FC10

Respondent: Stuart Richards [8717]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11914 - 8718 - FC10 - None

11914 Object

Focussed changes Appendix 5

FC10

Respondent: S M Smith [8718]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
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1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
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Statement of Focussed Changes (Joint Core Strategy)

O - 11917 - 8719 - FC10 - None

11917 Object

Focussed changes Appendix 5

FC10

Respondent: Mr J Rice [8719]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11920 - 8513 - FC10 - None

11920 Object

Focussed changes Appendix 5

FC10

Respondent: Mr David Hastings [8513]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11923 - 8720 - FC10 - None

11923 Object

Focussed changes Appendix 5

FC10

Respondent: Howard Wyatt [8720]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11926 - 8721 - FC10 - None

11926 Object

Focussed changes Appendix 5

FC10

Respondent: Tania Lean [8721]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11929 - 8722 - FC10 - None

11929 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs R A Pointer [8722]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11937 - 8726 - FC10 - i, ii

11937 Object

Focussed changes Appendix 5

FC10

Respondent: Persimmon/Hopkins Homes/Taylor Wimpey [8726] **Agent:** Savills (Cambridge) (Mr Colin Campbell) [7597]

Full Text:

Introduction

It will be important the planning policy regime facilitates development at North East Norwich, rather than putting barriers in the way. We support the need for coordination and cooperation, and the use of SPD to provide guidance on the implementation of policy. We would caution against the policy regime seeking too many layers of detail. Once the SPD is in place, developers should be able to bring forward planning applications with "detailed masterplans" forming part of the pre-application process rather than being a separate requirement.

Inconsistency of approach

We support the need for a coordinated approach to the Growth Triangle and remain committed to working with all stakeholders to bring forward sustainable development. We do, however, have some concerns regarding the consistency of approach within the policy. For example, The policy identifies the delivery of new homes at Rackheath in 2011/12. However, the DPD also identifies that growth of Rackheath will need to dovetail with the rest of the growth triangle. A report to Broadland's Cabinet in December 2009 estimated that it would take 12 months to prepare and adopt the SPD for the growth triangle. Given the likely adoption of the Joint Core Strategy by Mid 2011, the SPD is unlikely to be adopted before mid 2012. Further clarification is required as to how the coordinated approach will enable the objectives for the growth triangle to be achieved.

Para. 17 - it is unclear where the "expectation" that in addition to Rackheath there will be two further quarters is derived from. These are matters which should not be determined by the JCS, but once further information and evidence has been collected, and engagement has taken place with communities, landowners and developers.

Para 19 - The Green Infrastructure Delivery Plan (GIDP) sets out a significant number of priorities. Whilst we support the need to provide a range of accessible greenspaces for and within new communities, the priorities set out in the GIDP can only be considered as indicative owing to the absence of any testing through the development plan process.

Para. 20 - we support the use of greenspaces for a number of functions.

Para 23 - we agree that in determining the location of new secondary schooling regard has to be given to existing provision.

Para 24 - The supplement to PPS1 on climate change and planning is clear that local authorities should adopt a flexible approach to the provision of energy infrastructure. Proposals for development will need to meet the requirements under the Code for Sustainable Homes. It is not necessary for the JCS to dictate the form of energy infrastructure as this is contrary to national policy.

Our earlier representations submitted under the banner of the Broadland Land Trust have questioned the bringing forward of the timetable for achieving the Code for Sustainable Homes. Given the supplement to PPS1 and our earlier representations we consider that paragraph 24 should be deleted.

para. 30 - we consider the approach to affordable housing to be unsound. Development in the growth triangle will be delivered over a number of years. Developers need certainty if they are to be able to plan and deliver the social, economic and environmental infrastructure required to deliver sustainable communities. The policy implies that the percentage of affordable housing and tenure split might change during the construction of a community. The JCS should take a view as to what constitutes a mixed and balanced community and plan accordingly. Given Government's aspirations to assist people to own their own home, such a policy should seek to facilitate such an approach. In this regard measures such as shared equity and discounted/low cost homes for sale have an important role to play.

The proposed split between social rent and intermediate tenures in proposed paragraph 30 is inconsistent with proposed paragraph 5.28A. The Joint Core Strategy needs to recognise that strategic developments will be delivered over a considerable period of time and therefore that the split between social rent and intermediate should be planned in relation to longer term needs. Following the approach set out in 5.28B the target for Strategic Growth Locations should be 60% social rent and 40% intermediate.

Para. 33 - the meaning of "a further 4 court sports hall" is unclear. None of the other requirements in the policy are said to be "further". Paragraph 23 already refers to such a sports hall as part of the secondary school and the use of "further" here could be taken to imply this is additional to provision at paragraph 23.

The sixth bullet point appears to contradict the approach to green space set out at paragraph 20, which states that such spaces should be multi-functional and have multi-use. The approach at para. 33 appears to suggest a singular approach to each green space.

Para. 43 - we welcome the priority attached to ensuring that an adequate supply of land be maintained to meet growth needs. In order to achieve the scale of growth required in the Growth Triangle and across the plan area, early implementation within this Strategic Growth Location will be key. We recognise the need to take account of

Statement of Focussed Changes (Joint Core Strategy)

O - 11937 - 8726 - FC10 - i, ii

11937 Object

Focussed changes Appendix 5

FC10

infrastructure capacity issues, however, we consider that provision of the inner link road between Postwick and Sprowston will facilitate early development. The quantum of development that can be achieved should be informed by further detailed modelling along and innovative strategies toward non-car modes.

para. 44 - we consider that the JCS is unsound in stating that there can not be a commitment to large-scale development in the growth triangle until there is certainty over the Northern Distributor Road. The purpose of the JCS is to set out the Councils' strategy for meeting identified growth needs. The JCS will be the Councils' adopted policy and must therefore represent a commitment to working towards delivery of that strategy. Key issues for examination will be the extent to which the NDR is required to enable development and the scale of development which can proceed in advance of the NDR. Paragraph 43, 45, 46 and 47 already adequately cover the issue of phasing growth and we consider therefore that paragraph 44 is superfluous.

45 - 47

Given the priority of the JCS (as set out in para. 43) of maintaining an adequate supply of housing land the Examination will need to consider whether the restriction to 2,200 plus 1,000 dwellings at Rackheath in advance of the NDR, the inner link road and the Postwick Hub are justified. We consider that our clients interests as Sprowston can make an important contribution toward early development, where advantage can be taken of transport and community infrastructure already permitted and draw on existing facilities, such as schooling, public transport and shopping at Sprowston. Development at the urban edge also provides the opportunity to integrate with existing urban fabric.

Para. 51 - we welcome the opportunity to be involved in the SPD process and are committed to working with other land owners and developers, local communities, infrastructure and service providers, environmental groups and GNDP. We subscribe to collaborative approach with parties working together from the outset of the process to put in place a document which has the broadest possible support. As currently drafted, paragraph 51 might be simply taken to be a commitment to consult on the draft SPD. We consider that the JCS could usefully be expressed more positively and commit to a fully collaborative approach in the preparation and implementation of the SPD.

52 & 53 - in order to ensure that the planning policy process assists with the delivery of major projects through the planning system, these masterplans should be prepared and submitted as part of the planning application process, rather than being an additional layer of planning policy/guidance.

Map 1

We agree that there area around White House Farm should be included within the growth triangle. It is free from constraints and a major development opportunity. It is a highly sustainable location, either as part of a wider urban extension or as an individual proposal. It site alongside a proposed High Quality Public Transport route, is close to existing services and facilities such as schooling provision and the local centre at Sprowston. The land is in single ownership and capable of early delivery.

Map 2

We agree that there area around White House Farm is free from constraints and a major development opportunity. It is a highly sustainable location, either as part of a wider urban extension or as an individual proposal. It site alongside a proposed High Quality Public Transport route, is close to existing services and facilities such as schooling provision and the local centre at Sprowston. The land is in single ownership and capable of early delivery.

Summary:

A number of changes are required to the Appendix to provide a sound base for the SPD and to facilitate the delivery of major growth at North East Norwich

Statement of Focussed Changes (Joint Core Strategy)

O - 11942 - 8727 - FC10 - None

11942 Object

Focussed changes Appendix 5

FC10

Respondent: Mr J Mayhew [8727]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11945 - 8728 - FC10 - None

11945 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs L Mayhew [8728]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11948 - 8729 - FC10 - None

11948 Object

Focussed changes Appendix 5

FC10

Respondent: C Baxter [8729]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11951 - 8730 - FC10 - None

11951 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs I Baxter [8730]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11954 - 8731 - FC10 - None

11954 Object

Focussed changes Appendix 5

FC10

Respondent: G P Collins [8731]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11957 - 8732 - FC10 - None

11957 Object

Focussed changes Appendix 5

FC10

Respondent: Mr D H Lean [8732]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11960 - 8733 - FC10 - None

11960 Object

Focussed changes Appendix 5

FC10

Respondent: Lindsay Heard [8733]

Agent: N/A

Full Text:

Summary:

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Statement of Focussed Changes (Joint Core Strategy)

O - 11964 - 8734 - FC10 - None

11964 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs J Snelling [8734]

Agent: N/A

Full Text:

Summary:

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4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11967 - 8735 - FC10 - None

11967 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Daphne R Wyatt [8735]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11970 - 8736 - FC10 - None

11970 Object

Focussed changes Appendix 5

FC10

Respondent: P Wyatt [8736]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11973 - 8737 - FC10 - None

11973 Object

Focussed changes Appendix 5

FC10

Respondent: J B Granger [8737]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11976 - 8738 - FC10 - None

11976 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs C Granger [8738]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11979 - 8739 - FC10 - None

11979 Object

Focussed changes Appendix 5

FC10

Respondent: Roy Durrant [8739]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11982 - 8740 - FC10 - None

11982 Object

Focussed changes Appendix 5

FC10

Respondent: Neil Dobson [8740]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11983 - 8741 - FC10 - i, ii, iii

11983 Object

Focussed changes Appendix 5

FC10

Respondent: Ian Perry [8741]

Agent: N/A

Full Text:

Summary:

I am very concerned about the changes to the Joint core Strategy for Broadland, Norwich & South Norfolk. The effect would be to give the JCS the powers to make and change plans, exclude public examination and not be subject to independent hearings. I agree with the Government's wishes to give powers back to communities to decide on local planning. The localism bill which the Government announced after the election must be part of any consideration of planning policy for the future.

Statement of Focussed Changes (Joint Core Strategy)

O - 11993 - 8060 - FC10 - None

11993 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Peter Lanyon [8060]

Agent: N/A

Full Text:

Summary:

It fails to comply legally because the conduct of the public consultation in which it was presented to local communities backed the Aarhus Convention in manners that I shall make clear in due course. It is unsound because, by changing the growth triangle to Strategic Allocation from a Location, it would largely exclude over a long period of public participation in the development of the JCS. This flies in the face of Government announcements about community involvement in such matters. Having participated for six and a half years in an advisory body to the Ministry Of Defence on public consultation and participation in the ISOLUS Project, I have an insight into good and bad practice in public consultation that is directly relevant here, and that is not shared by anyone else I know who is involved in the JCS or the Focussed Changes.

I have already submitted my comments within the parameters you saw fit to require in your representations document. I am adding these comments both because I believe your restriction of comments to those parameters rendered the consultation unfit for purpose, and because I insist upon being allowed to submit my comments as and how I wish, provided they are relevant and civil. Please register me as an objector and acknowledge receipt of this letter, or show reason why it has not been accepted. My comments concern Replacement Policy 10 (FC8 and FC9) and Replacement of Appendix 5 (FC10). There is manifest bad faith in such a change of status, so late and during holiday times, from a Location of 1000s of horses in the North East Norwich Triangle to a Strategic Allocation, since it deprives the public of adequate participation in the decision-making process. Difficulty of access, technical complexity, and inadequate exposure of the Focussed Changes make the bad faith appear wilful rather than incompetent. A malign intention is apparent in the Change, because its effect would be to convert the Area Action Plan into a Supplementary Planning Document, that would enable the Authorities largely to evade public participation of the developments over a long period into the future. Antisocial and anti-environmental intentions are apparent in the inevitable effects on woodlands, open spaces and parklands in the Appended Map. The predication of all these plans and changed plans upon the proposed Northern Distributor Road ensures that they are all unsound, since the handling of that road by local authorities over the past several years has lacked the honesty and openness necessary in such planning processes.

Statement of Focussed Changes (Joint Core Strategy)

O - 11995 - 8747 - FC10 - None

11995 Object

Focussed changes Appendix 5

FC10

Respondent: Miss C M Parrott [8747]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 11997 - 4454 - FC10 - None

11997 Object

Focussed changes Appendix 5

FC10

Respondent: Mr S. McKelvey [4454]

Agent: N/A

Full Text:

Summary:

The document states, Policy 10 identifies this location, shown on map 1, for a major urban extension, providing for 10,000 dwellings (7000 by 2026)... This planned number of houses would transform the area out of all recognition with a significant reduction in the quality of life all the existing residents. There would also be a loss of hundreds acres of valuable agricultural land, which probably the most important natural resource we have. With population growth and climate change, food security will become one of the most pressing problems in coming years. So we must redevelop all existing brown field sites, before another single green acre is lost. Now that local councils have the power to set their own housing targets, the planned number of houses should be scaled back to less than one tenth of the above.

Statement of Focussed Changes (Joint Core Strategy)

O - 12001 - 8750 - FC10 - None

12001 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Anastasiou [8750]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

- i. Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii. Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

- * The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during the period most councillors will be away on holiday.
- * Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
- * I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
- * I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12003 - 8749 - FC10 - None

12003 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs M Morgan [8749]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12006 - 8751 - FC10 - None

12006 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Anastasiou [8751]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during the period most councillors will be away on holiday.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12009 - 8752 - FC10 - None

12009 Object

Focussed changes Appendix 5

FC10

Respondent: Alison Wright [8752]

Agent: N/A

Full Text:

Summary:

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12012 - 8753 - FC10 - None

12012 Object

Focussed changes Appendix 5

FC10

Respondent: J E Townsend [8753]

Agent: N/A

Full Text:

Summary:

Herewith my formal object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12015 - 8754 - FC10 - None

12015 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs M Mobbs [8754]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12018 - 8755 - FC10 - None

12018 Object

Focussed changes Appendix 5

FC10

Respondent: R J Hastings [8755]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12021 - 8756 - FC10 - None

12021 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs Roger & Janice Smith [8756]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12024 - 8757 - FC10 - None

12024 Object

Focussed changes Appendix 5

FC10

Respondent: Barry John and Nicola Theobald [8757]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12028 - 8758 - FC10 - None

12028 Object

Focussed changes Appendix 5

FC10

Respondent: Jeanette Rose [8758]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. Public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised but very badly advertised. Although the notice was put in the local press, many people do not take a daily newspaper and therefore would not be aware of any public meetings. No publicity was put in Salhouse and nothing was advertised at Jubilee Hall on the day, apart from the front door being left open!

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12030 - 8759 - FC10 - None

12030 Object

Focussed changes Appendix 5

FC10

Respondent: Julia Yates [8759]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12034 - 8761 - FC10 - None

12034 Object

Focussed changes Appendix 5

FC10

Respondent: Ms Judith Hurrell [8761]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12036 - 8760 - FC10 - None

12036 Object

Focussed changes Appendix 5

FC10

Respondent: Mr A Birks and Miss N Cook [8760]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12039 - 8762 - FC10 - None

12039 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Patricia Hurrell [8762]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12043 - 8763 - FC10 - None

12043 Object

Focussed changes Appendix 5

FC10

Respondent: Sharon Ingram [8763]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12045 - 8764 - FC10 - None

12045 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs J Layton [8764]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12048 - 8765 - FC10 - None

12048 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs Gladwell [8765]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12051 - 8766 - FC10 - None

12051 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs C Hollidge [8766]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12054 - 8767 - FC10 - None

12054 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Alan Samwell [8767]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parkland.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Please respond to this letter and include it in the record of public responses to the consultation.

Statement of Focussed Changes (Joint Core Strategy)

O - 12057 - 8087 - FC10 - None

12057 Object

Focussed changes Appendix 5

FC10

Respondent: Miss Marguerite Finn [8087]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12060 - 8660 - FC10 - None

12060 Object

Focussed changes Appendix 5

FC10

Respondent: Julie Wilson [8660]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12063 - 8768 - FC10 - None

12063 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Paul Osborne [8768]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12066 - 8769 - FC10 - None

12066 Object

Focussed changes Appendix 5

FC10

Respondent: Jonathan Kemp [8769]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focussed Changes:

Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focussed Changes are unsound for the following reasons:

* The change in status from a broad location for growth for up to 10,000 new houses in North-East Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find more out have been organised.

* Re-labelling the North-East Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

* I am concerned about the direct and indirect impacts of a large amount of growth on the areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (i.e. land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

* I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the North-East of Norwich. As well as loss of farmland and countryside, a development on this scale will result in adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12069 - 8770 - FC10 - None

12069 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Julie Grimes [8770]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

1. Replacement Policy 10 (FC8 and FC9) Location for major new or expanded communities in Norwich Policy Area
2. Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement.

Please register me as an objector. In my view, the Focused Changes are unsound for the Following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in northeast Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised. I myself did not know about the policy's Numbered 1 and 2 above until this week and the closing date is the 30' August.

2. Re-labelling the north-east Norwich growth location as a Strategic Allocation to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'White space' within the growth triangle (ie land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses identified as having environmental constraints would have to be sacrificed to development, Or, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4 I object in principle to the purposed development of up to 10,000 based around a Norwich Northern Distributor Road to the north-east of Norwich. As well, as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham road and salhouse road.

It is about time we released that destroying woodland, common land were its been left to develop, nature takes its own course and wildlife has moved in Over many, many years its uniqueness should be cherish. These places should be left alone for us humans to enjoy as well as the wildlife. Once gone they will never be able to be copied for the next generation as so many other things can. Were will there children go to enjoy nature at its best see old giant trees capture there imaginations. Books, pictures, will he no sub torte for the real thing Were so lucky here in Norfolk to have these Lets Keep it that way.

Beautiful plaices for wildlife and the Mature Trees are not only providing food homes for these, There helping to clean are air. Yes, there going to plaint new saplings that yes absorb more carbon as they grow than mature trees but let us stop playing that excuse to get around cutting mature trees. In our grand children's life time they may never see the beauty of mature trees in there tall giant splendour until there 50 plus if we keep on cutting these trees down, the oak tree is now being threatened by

some bug like the elm so we are losing trees so cutting healthy ones own is just radicalises .

Statement of Focussed Changes (Joint Core Strategy)

O - 12072 - 8771 - FC10 - None

12072 Object

Focussed changes Appendix 5

FC10

Respondent: Miss Jenny Morgan [8771]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12075 - 8310 - FC10 - None

12075 Object

Focussed changes Appendix 5

FC10

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12084 - 8310 - FC10 - i, ii, iii

12084 Object

Focussed changes Appendix 5

FC10

Respondent: Mr I T Smith [8310]

Agent: N/A

Full Text:

Summary: [not supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12091 - 8309 - FC10 - None

12091 Object

Focussed changes Appendix 5

FC10

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary:

wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe st Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised. Most Parish Councils will not be able to respond and they are not likely to be meeting during this period and most councillors will be away on holiday.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. It would also impact on Wroxham and Hoveton causing massive traffic jams and serious damage to the tourism industry.

Statement of Focussed Changes (Joint Core Strategy)

O - 12094 - 7971 - FC10 - i, ii, iii

12094 Object

Focussed changes Appendix 5

FC10

Respondent: COLNEY PARISH MEETING (Dr Graham Martin)
[7971] Agent: N/A

Full Text:

Summary:

Ref. JCS FOCUSSED CHANGES REPRESENTATIO

Special reference to FC 9and FC10

This parish does not support the massive housing developments planned in the JCS as they are based on an out of date strategy and are unsustainable. The current changes do not address our concerns. We are especially concerned about the implications of FC 10.

We believe the JCS is NOT SOUND because its is not justified, not effective and not consistent with National Policy

We do not believe it is reasonable for the Council to take powers to exclude public involvement in the development of the Joint Core Strategy. This policy is an enabling document to create a Strategic Allocation which will be administered using a Supplementary Planning Document. The use of an SPD covering the entire Growth Triangle and for the whole of the period of this plan as a device to take total control of housing development and would set a precedent for housing development in the whole Greater Norwich Area. This is undemocratic. It is also in direct contravention to the stated aims of the government to give powers back to communities to decide how local planning should evolve. It will ignore Parish Plans and govern by dictat which is completely unacceptable. The Localism Bill which the Government announced after the election must be part of any consideration of Planning Policy for the future.

Yours sincerely,

Dr Graham Martin

Chairman

Colney Parish Meeting

Statement of Focussed Changes (Joint Core Strategy)

O - 12095 - 8775 - FC10 - None

12095 Object

Focussed changes Appendix 5

FC10

Respondent: M P Hensley [8775]

Agent: N/A

Full Text:

Summary:

Dear GNDP

Date 27th August 2010

I wish to formally object to the Focused Changes mainly the following.

Replacement Appendix (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement.

I am concerned about the direct impact of large amount of growth on areas shown as environmental constraints on the proposal map Appendix.

Such as woodlands open spaces and historic parkland, area shown as white space, (ie land not yet developed)

I can see lots of traffic problems etc on the Salhouse, Plumstead roads etc on entering Norwich.

10,000 dwelling is madness around thease areas based around a Norwich Northern Distributor Road.

Your sincerely

Statement of Focussed Changes (Joint Core Strategy)

O - 12099 - 8777 - FC10 - None

12099 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs J A Watts [8777]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 1O (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12107 - 8309 - FC10 - i, ii, iii

12107 Object

Focussed changes Appendix 5

FC10

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [None Supplied]

Statement of Focussed Changes (Joint Core Strategy)

O - 12113 - 8779 - FC10 - None

12113 Object

Focussed changes Appendix 5

FC10

Respondent: Margaret Prime [8779]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of farmland and countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road. Also the use of top grade agricultural land being used for building when food for future generations will be so important. How stupid is this?

Statement of Focussed Changes (Joint Core Strategy)

O - 12114 - 7162 - FC10 - ii

12114 Object

Focussed changes Appendix 5

FC10

Respondent: Martin Robeson Planning Practice (Luke Raistrick) **Agent:** N/A
[7162]

Full Text:

Summary:

Policy EC3 of PPS4 advises LPAs, as part of their plan making, to "define a network and hierarchy of centres that is resilient to anticipated future economic changes, to meet the needs of their catchments. ..Identified deficiencies in the network of centres should be addressed by.. designating new centres where necessary". PPS4 also states that "district centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of on-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library" - district centres should therefore hold a retail function primarily.

The Concept Statement does appreciate that the growth triangle will need to accommodate new local facilities to complement the housing provided, however retail, which will be an intrinsic element, is not cited explicitly as one of these 'local facilities'. In order for the Concept Statement (and LDF generally) to effectively deliver a holistic urban extension, it is necessary to make explicit reference to retail.

The first sentence of paragraph 1 should be modified as follows - "Policy 10 identifies this location, shown on map 1, for a major urban extension, providing for 10,000 dwellings (7,000 by 2026) served by new local facilities to complement the houses, including retail and social facilities and employment, waste recycling and extensive green infrastructure".

The second sentence of the Vision should be modified as follows - "Alongside housing, employment opportunities, retail, services, facilities and key infrastructure will have been delivered across three or four main development centres".

The first bullet point under 'Services' within the Objectives should be modified as follows - "provide the services and facilities, such as retail, that will meet the need of the Growth Triangle as it grows".

The first sentence at paragraph 32 should be modified as follows - "It is important that masterplans for the area recognise the need for a rich mixture of uses including employment, retail and community uses.. .".

The last sentence of paragraph 32 should be modified as follows - "Particular attention in this respect will need to be given to the location of a district centre, and the high school and other facilities such as a swimming pool where access from all pads of the triangle and adjoining neighbourhoods is likely to be critical". This complies with paragraph 42 which explains that the growth triangle must assimilate with the existing neighbourhoods, including the shared use of infrastructure, such as the proposed district centre.

Statement of Focussed Changes (Joint Core Strategy)

O - 12118 - 8458 - FC10 - None

12118 Object

Focussed changes Appendix 5

FC10

Respondent: Mr John Michael Evans [8458]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12121 - 8780 - FC10 - None

12121 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Eric Wise [8780]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the focused changes:

- i) Replacement Policy 10 (fc8 & fc9): Locations for major new or expanded communities in the Norwich Policy area.
- ii) Replacement appendix 5 (fc10) Old Catton, Sprowston, Rackheath, Thorpe St.Andrew Growth Triangle concept statement.

Please register me as an objector. In my view the focused changes are very unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed concept statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the North East Norwich growth location as a ' Strategic Allocation', to be followed up by a supplementary planning document rather than an area action plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the proposals map accompanying appendix 5 such as woodlands, open spaces and historic parklands.

The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having enviromental constraints) does not appear to have been assessed for its potential housing capacity.

I am concerned that the proposed number of new houses could not be accomodated within the white space and therefore either some land identified as having enviromental constraints would have to be sacrificed to development, or the proposed number of new builds would have to be scaled down.

THE JCS AND FOCUSED CHANGES DO NOT ADDRESS THIS IMPORTANT ISSUE.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Northern Distributor Road to the North East of Norwich.

As well as a loss of countryside a development on this scale will result in other adverse effects such as major traffic growth, notably Wroxham Road and Salhouse Road, also impacting heavily on other major roads to the east.

Statement of Focussed Changes (Joint Core Strategy)

O - 12124 - 8782 - FC10 - None

12124 Object

Focussed changes Appendix 5

FC10

Respondent: Ms Thelma Berry [8782]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12127 - 8651 - FC10 - None

12127 Object

Focussed changes Appendix 5

FC10

Respondent: Greg Townes [8651]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12130 - 8783 - FC10 - None

12130 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Linda Townes [8783]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12133 - 8784 - FC10 - None

12133 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Martin Thurlow [8784]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
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3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12136 - 8785 - FC10 - None

12136 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs Simon and Veronique Cornish [8785]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register US as objectorS. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12139 - 8786 - FC10 - None

12139 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Anthony Austwick [8786]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector.

In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road, Salhouse Road and the Plumstead Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12142 - 8787 - FC10 - None

12142 Object

Focussed changes Appendix 5

FC10

Respondent: Prof Leslie H Sutcliffe [8787]

Agent: N/A

Full Text:

Summary:

Statement of Focused Changes - public consultation 19 July - 30 August

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Statement of Focussed Changes (Joint Core Strategy)

O - 12146 - 8790 - FC10 - None

12146 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Mark Gunton [8790]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12149 - 8789 - FC10 - None

12149 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs J P and H A Shanks [8789]

Agent: N/A

Full Text:

Summary:

We are very concerned by the fact that the public consultation period regarding the Focussed Changes to the Joint Core Strategy has been held during the holiday period. This has limited the opportunities for local views to be heard. Neither are we satisfied with the proposal to reclassify this area as a 'strategic allocation', which we believe would mean that future work could be progressed through a Supplementary Planning Document instead of a Area Action Plan. We understand that the effect of re-classification to an SPD would be that changes could be made to the Growth Triangle Plans without further public consultation. This, in our view, is undemocratic and improper. Whilst we appreciate the importance of meeting social needs, it is the massive scale of the growth, without the need for local consensus, which we find totally unacceptable. We have read local news accounts about our woodlands being considered for development. Local people feel desperate about this - for themselves and future generations - and we do not see how the so-called guardians of our county could have even considered this step. We strongly urge district councils to work with local people to find a better way forward. For example, by small-scale developments that support individual local needs and job opportunities; spread around the county and in areas where they exist. We have responded by letter rather than on the Representation Form, which appears too prescriptive, but trust that you will include this in the record of public responses.

Statement of Focussed Changes (Joint Core Strategy)

O - 12152 - 8792 - FC10 - None

12152 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Susan Simpson [8792]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12155 - 8793 - FC10 - None

12155 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs WJ Bateman [8793]

Agent: N/A

Full Text:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12161 - 8791 - FC10 - None

12161 Object

Focussed changes Appendix 5

FC10

Respondent: M J Canfor [8791]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12162 - 8794 - FC10 - None

12162 Object

Focussed changes Appendix 5

FC10

Respondent: Sarah Tetlow [8794]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12166 - 8795 - FC10 - None

12166 Object

Focussed changes Appendix 5

FC10

Respondent: H Canfor [8795]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12169 - 8796 - FC10 - None

12169 Object

Focussed changes Appendix 5

FC10

Respondent: Michael Tetlow [8796]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12173 - 8797 - FC10 - None

12173 Object

Focussed changes Appendix 5

FC10

Respondent: Mr and Mrs P Raven [8797]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

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Statement of Focussed Changes (Joint Core Strategy)

O - 12177 - 8799 - FC10 - None

12177 Object

Focussed changes Appendix 5

FC10

Respondent: M D Absalom [8799]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12181 - 1781 - FC10 - None

12181 Object

Focussed changes Appendix 5

FC10

Respondent: Blofield Parish Council (Mrs D Wyatt) [1781]

Agent: N/A

Full Text:

Summary:

The Council objects to the introduction of the Concept Statement as a revised appendix to the Joint Core Strategy:

1. To replace a map showing the Growth Triangle with an 18 page wide-ranging concept statement and then say in the preamble that this is not an opportunity for people to add to their original representations, seems unreasonable.
2. This concept statement contains changes to the Joint Core Strategy which would be challenged but to require consideration of these within this consultation and without appropriate connection to the public renders this virtually impossible.
3. The concept statement represents the introduction of an SPD process at this late juncture covering all the growth triangle for the full period of this plan. This is wholly contrary to the stated aim of the Government to 'put the local community in the driving seat- giving real power to local people to control the way in which villages, towns and cities develop'. The introduction of planning through an SPD would be contrary to this objective.
4. The continued reliance on the NDR and the promises on other infrastructure show that the concept itself contains significant flaws.

Statement of Focussed Changes (Joint Core Strategy)

O - 12183 - 7172 - FC10 - i, ii

12183 Object

Focussed changes Appendix 5

FC10

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary: Appendix 5 Paragraph 1:

Not justified:

- no evidence to demonstrate whether there is sufficient land for up to 10,000 new dwellings and other types of development within the fixed boundaries of the growth triangle without encroaching on areas shown as environmental constraints in maps accompanying Appendix 5.

- no credible or robust evidence base to show that large scale road building near new development facilitates walking and cycling as principal modes. It goes without saying that such road building is likely to ensure that the private car is the preferred mode. This risks undermining the objectives and concept of the eco-town contrary to national policy to reduce reliance on the private car and to reduce the need to travel (PPG13, PPS1).

- no evidence to support the claim that the NDR is necessary for serving the extension for the reasons outlined in FC8 above (p. 6).

- no evidence to show how and to what extent the NDR facilitates public transport, walking and cycling. The County Council's Major Scheme Business Case for the NDR shows that in north Norwich, the NDR would reduce traffic flows by only 1.68% in the AM peak(5) and increase traffic by 0.04% in the PM peak. In contrast, evidence from the Department for Transport's Sustainable Travel Demonstration towns has shown that the delivery of an intensive programme of Smarter Choices reduces car trips by 9% and car mileage by 5%.

Appendix 5, Paragraph 10: is not effective as it is questionable whether a NDR can be delivered. It is also not justified as the most recent advice from Government to Norfolk County Council regarding the NDR states,

" Local Authorities.... should not that assume schemes prioritised under the previous Government's Regional Funding Allocations (RFA) process will be funded to the previous published levels.We would therefore strongly advise you to minimize further development activity on this scheme " . (6)

Paragraph 10 is not effective on the basis that delivery of Postwick Hub is questionable. The most recent advice from Government to Norfolk County Council states:

"In view of the uncertainty over the availability of the funding for the scheme (ie Postwick Hub), it has been decided to defer, for the time being, the holding of a local inquiry. The way forward on this scheme should become clearer once the spending review is complete." (7)

Paragraph 10 is not justified as there is no credible evidence to show an NDR is part of the "baseline". Since it has not been built, the road cannot be considered as part of the baseline for the development strategy.

Paragraph 10 is Not Justified: There is no credible or robust evidence base to show that large scale road building facilitates walking and cycling as principal modes. Norfolk County Council has no committed plans to delivering any large scale changes in the reallocation of road space towards sustainable modes following the implementation of an NDR. Apart from a BRT route along Salhouse Road, the Proposals Map (Constraint and Opportunities, Appendix 5) shows no other sustainable transport infrastructure measures such as a bus lane along Wroxham Road and a strategic cycle network.

Paragraph 44: This is not justified as there is no clear evidence to show that the NDR is needed to solve the existing transport problems in Norwich.

Paragraphs 44- 47: By its own admission, the JCS shows that the development allocated in the growth triangle is almost certainly not deliverable as, it is claimed, it is entirely dependent on the NDR and/or the Postwick Hub improvements and there is significant uncertainty over the funding for both of these schemes. Here the JCS as a whole is shown not to be effective because the strategic allocation, on which rests the entire strategy, is not deliverable without the NDR. Indeed, the GNDP is clearly stating that without the NDR and Postwick Hub there can be no commitment to growth in the growth triangle. It raises the question as to where this growth will be going instead, but the JCS offers no alternative locations should this situation arise.

(5) NNTAG and CPRE assessment of NDR Major Scheme Business Case, December 2008. The need to free up road space is most pertinent during the peak periods. At other times there is ample capacity to reallocate road space

(6) Letter re NNDR from Dept. for Transport to Mike Jackson Norfolk County Council dated 10 June 2010.

(7) Letter from Government Office for East Midlands 2 August 2010 advising the Minister will hold a local inquiry into A47 Trunk Road (Postwick Interchange) Slip and Side Roads Orders.

Statement of Focussed Changes (Joint Core Strategy)

O - 12187 - 8798 - FC10 - None

12187 Object

Focussed changes Appendix 5

FC10

Respondent: Diana Campbell [8798]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12189 - 8801 - FC10 - None

12189 Object

Focussed changes Appendix 5

FC10

Respondent: Mr R J Halford [8801]

Agent: N/A

Full Text:

Summary:

Having just driven from Rackheath to Wroxham and observed once again the extreme pressure of traffic on the way into Hoveton, particularly at this time of year, even without any further housing development in the general area, I wish to formally object to the Focussed Changes:

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Statement of Focussed Changes (Joint Core Strategy)

O - 12192 - 8234 - FC10 - i, ii, iii

12192 Object

Focussed changes Appendix 5

FC10

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary: FC10 Pt. 30

The basis on which the 40% affordable housing requirement, not only for the growth area but for the whole Plan area, is fundamentally flawed. As suggested in Lothbury Property Trust Company Ltd's objection to Policy 4 of the Pre-Submission Stage Joint Core Strategy Consultation, and supported by the Inspectors Conclusions from the Exploratory Meeting for the Joint Core Strategy, a Housing Viability Assessment has been undertaken. However, there are significant flaws that render all calculations with regards to the viability of housing schemes inaccurate:

1. The Council have assumed a figure of £7,000 per unit is requested towards all Section 106 contributions and future CIL costs not exceeding £15,000 (higher option) (see attachment 1 - Council's Affordable Housing Viability Study). This would appear to be a significant undervaluation, as this only just exceeds the education contribution for individual properties (£6,436 - see attachment 2). Some current developments at present take advantage of capacity within existing schools to reduce this figure, but this situation cannot be maintained. The suggested figures, particularly the Section 106 figure, do not even cover frequently requested requirements, such as open space. In addition, significant additional costs are usually necessary for a variety of requirements, including highways, archaeology, flood risk/drainage and ecology. Ground works, infrastructure and developer contingency costs also have the potential to significantly increase the associated costs with developing a site.

A good example of this is the current application submitted by Lothbury Property Trust Company Ltd at Brook and Laurel Farm, Thorpe St. Andrew (Application No. 20090886). With education requirements, on site open space provision, extra highway infrastructure, drainage costs etc, it is estimated that c. £18.6 million is required for the residential element of the scheme, or £31,000 per dwelling. This is 4.3 times that estimated in the Housing Viability Assessment. The figure in this example is comparable to that identified as necessary for a residential tariff for funding infrastructure for the Growth Area within Broadland District (£28,603 per dwelling in the Greater Norwich Infrastructure Needs and Funding Study (October 2009) - see attachment 3). This supports a considerably higher figure and discredits lower figures cited by the Council in the Affordable Housing Viability Assessment. Such a variation clearly indicates that the Council's assumptions regarding costs are inaccurate and compromises the resultant viability calculations.

2. The Council's estimates regarding land values and how these have been fed into the different scenarios are questionable. In the Growth Triangle, most housing development will take place on greenfield land. The Council Affordable Housing Viability Study suggests a land value of between £500,000 - £750,000 per hectare - see attachment 4. Even given the recession, a higher range of £750,000 - £950,000 per hectare (300,000 - £400,000 per acre) should be considered low, and this is notably higher than that suggested by the Council.

Whilst it is accepted that land values have fallen in recent years, given the timeframe for which work towards the LDF commenced, most developers would have secured options on greenfield sites before the reduction in values occurred. Before the recession, values were easily double those in the Council's Viability Assessment. This changes the base figure against which subsequent calculations need to be undertaken.

At the Consultation Meeting with regards to the Affordable Housing Viability Assessment in Spring 2010, I made the point that actual worked examples, particularly of land values, need to be provided to justify the assessment. Drivers Jonas Deloitte, who prepared the Affordable Housing Viability Assessment on behalf of the Greater Norwich Development Partnership accepted that this would provide clarity to the workings. No such worked examples have emerged.

The Council's Affordable Housing Viability Assessment has taken an inconsistent approach towards market forces, so that a positive spin is placed on the results. It is only current land values that have been incorporated into the calculations, whilst disregarding values before the recession occurred, even though it is from this period that options on land would have been agreed. In contrast, the prediction for development values are based on both current and revised upward values, on the assumption of development beyond the recession. This creates a strong bias in favour of the Council for supporting the Viability Appraisal, despite references to the report taking a 'pessimistic' stance.

3. Despite the inaccuracies noted above, insertion of the low cost figures into calculations in the Affordable Housing Viability Assessment, still only identifies 30% of schemes as being likely to support 40% affordable housing for the 'base' assumptions (chart 1) and 47% on the 'refined' (i.e. higher market values) assumptions (chart 3). Neither figure concludes that the market can support such a high percentage. These figures are increased on the assumption that grant money is available to assist with construction of affordable housing. At present, the Coalition Government are significantly reducing the monies available for such grants, and no assumptions on such monies being available can realistically be incorporated. This point is stressed in the Inspector's Conclusions from the Exploratory Meeting for the Joint Core Strategy (page 3). In light of the inaccuracies cited in points 1 and 2 above (and the lack of 'real' examples), the level of sites capable of providing a 40% affordable housing contribution will be lowered even further below the

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figures identified by the Council's report. It is not logical to incorporate a policy setting out a requirement, in which a high proportion of developments cannot comply. Setting an unrealistic target is instigating unnecessary additional work for developers and discouraging development as a whole within the area.

The inaccuracies in the background information does not provide a robust and credible evidence base upon which to formulate policies. This section of the Core Strategy is therefore contrary to PPS 12 paragraphs 4.36, 4.37 and 4.52 (+ accompanying box) and is thus unsound.

Works required to become sound

Further evaluation of Affordable Housing Viability incorporating the analysis identified above.

Attachment 1: Extract from the greater Norwich Development Partnership's Affordable Housing Viability Study (July 2010)

8.9 Housing Market

We have sought to reflect changes in strength in housing markets. The main areas that this affects are:

* a developer's perceived risk of undertaking a scheme, and consequently the profit that the developer seeks; and

* the demand from the market for any completed units, and consequently the rate at which completed units sell.

Our study appraises three scenarios to reflect weak, neutral or strong market conditions, with sales rates varying between 2 and 7 units per month, and developer's profits as follows:

* 17.5% on cost in a strong market;

* 20% on cost in a neutral market; and

* 25% on cost in a weak market.

8.10 Section 106 and CIL Costs

Section 106 costs can vary greatly from scheme to scheme. We have followed guidance available on Broadland's and Norwich's websites, which suggest around £7,000 per unit is sought.

We have discussed this sum with members of GNDP, who ordinarily work in a planning capacity within the Local Authorities that make up GNDP. Whilst both lower and higher costs are secured on a site specific basis, it was believed that £7,000 per unit is representative of an approximate average over the policy area.

The future of the Community Infrastructure Levy (CIL) is uncertain, as is the quantum of any payments that may be required as part of it. As an aside from the main study, we have been asked to consider the impact on viability of potential CIL costs.

We have considered the impact of the following planning obligation costs:

* £7,000 per unit on all units (current section 106 cost assumption);

* £10,000 per unit on private market units only (potential future CIL scenario);

and

* £15,000 per unit on private market units only (potential future CIL scenario).

8.11 Other

As part of the Study, we have assumed a number of fixed costs. These include:

* Professional fees: 12% of construction cost

* Contingency: 5% of construction cost

* Planning costs: £300 per unit

* Finance: 6.5%

* Sales & Marketing Costs: 3.5% of GDV

Our Study, as requested by GNDP, builds on work already undertaken by a group of consultants led by AECOM. This work formed part of the evidence base for the Joint Core Strategy for Broadland, Norwich and South Norfolk, and was also used to inform the development of the Greater Norwich Integrated Development Plan.

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Attachment 2: Broadland District Council Section 106 Contributions Proposal for Application 20090886 - 600 houses plus employment land (July 2010)

The breakdown of the types of dwellings proposed for this development has been expressed as a percentage in the application pack. This results in the following types and numbers of dwellings:

1 bed flats: 96

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2 bed flats: 12
3 bed houses: 300
4 + bed houses: 180

Total: 588

The application form states that there are 600 houses, but the percentages do not add up to this total. For the purposes of these calculations the figure of 588 will be used. As such the education contribution will be less than will be required, but the library, fire hydrant and transport contributions will be made on the assumption of 600 dwellings..

Education Contribution

The cost per dwelling for a house (multi-bed) is £6,436.
The cost per dwelling for a flat (multi-bed) is £3,218.

Houses: $6436 \times 480 = £3,089,280$
Flats: $3,218 \times 12 = £38,616$

Total: = £3,127,896

However, there is no nursery contribution required as there is spare capacity in the area so £489 can be taken off the cost per each dwellinghouse (note this was not on the flats in the first instance).

Houses: $489 \times 492 = £240,588$

Total contribution with nursery contribution taken off = £2,887,308

Furthermore there is some spare capacity at the new Dussindale Primary School and 128 of the proposed properties are exempt from contribution.

Cost per house of primary provision = £2,958
 $£2,958 \times 128 = £378,624$

This figure is then subtracted from the total contribution with nursery contribution taken off.

Total education contribution = £2,508,684

Library Contribution

£60 per dwelling, so £60 x 600 dwellings.

Total = £36,000

Highways Contribution

It should be noted that only rough figures have been received from the Highways department.

Public transport contributions for employment = £1m

Public transport contributions for housing = £1m+
(The developer will need to talk to the local bus operators for an accurate figure to be agreed)

Travel plan for employment (5 years) = Circa £200,000

Travel plan for housing = £279,000
(£465 per dwelling for 5 years)

Total = £2,479,000

Fire Hydrant Contribution

1 hydrant per 50 dwellings at £763 per hydrant:
 $£763 \times 12 = £9,156$

2 hydrants required for the commercial uses:
 $£763 \times 2 = £1,526$

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Total = £10,682

However, it should be noted that the provision of fire hydrants would be accepted as a condition and as such will not be included in the final total.

Open Space Contribution

No open space contribution has been calculated as the application indicates that 20ha are proposed with this development. This is not broken down into what is publically accessible and what is not, but the plans show significant areas of publically accessible open space. A calculation has shown that around 3.5ha of open space would need to be provided on site or else contributed towards, and it is considered that this would be easily provided for on the site.

Total contribution required = £5,023,684

Total contribution proposed = £600,000

Total deficit = £4,423,684

Note: This excludes the fire hydrant contribution.

Attachment 3: Extract from the Greater Norwich Infrastructure Needs and Funding Study (October 2009)

GREATER NORWICH INFRASTRUCTURE NEEDS & FUNDING STUDY | 10

The key to a successful tariff model is that it is affordable and viable in the marketplace so as not to prevent development being brought forward. We have therefore undertaken a detailed analysis on the local property market and in the report we set out a few of the most salient points that will affect the setting of tariff policy and the potential income that can be derived from developer contributions. In setting the level of tariff, consideration needs to be given to the different market conditions within the region and we have identified a number of discernible sub-markets within Greater Norwich with different cost and value characteristics.

We have identified the cost of infrastructure for each of the growth locations and identified the cost of infrastructure by dwelling. This provides an understanding of the level of required developer contributions per dwelling required to bridge the funding gap.

Given the market context both geographically and over time we have carried out an assessment of the level of tariff that could be achieved based on current and strong market conditions across each of the residential market areas. In setting the charging schedule, consideration will need to be given to applying a variable rate of tariff, particularly for schemes that come forward in the short term, which would otherwise be unviable.

We undertook appraisals for each of the districts, with two sets of appraisals being carried out for South Norfolk for each of the housing market areas identified in this district. The appraisals were based on current sales values and values being achieved during the last peak in the housing market. Given the different nature of residential development within Norwich city in comparison with South Norfolk and Broadland i.e. higher density and predominantly flatted schemes, we applied different density and unit mix assumptions for Norwich City.

To provide an indication of the potential maximum tariff levels that could be applied to residential developments we have used a single hectare development model to assess viability.

Potential Tariff Requirements

* Within Norwich a tariff of £19,469 per dwelling would be needed if contributions from residential schemes are to bridge the funding gap identified. Although this could be achievable for an average sized scheme with housing grant, due to the individual nature of development sites within Norwich flexibility is needed to take into account site specific viability issues.

* Within Broadland the residential tariff required to fund the infrastructure needed for the Sprowston growth area is £28,603 significantly higher than for the rest of Broadland at £6,844. Whilst the tariff rate required for the rest of Broadland is achievable, the rate needed for the growth area is challenging and is likely to only be viable for agricultural sites with no alternative use value and where housing grant is available. This will still require landowners to agree to sell their land at significantly lower values in comparison to values that have been achieved previously.

* The residential tariff requirements for the South Norfolk strategic growth locations range from £10,992 in Cringleford to £61,071 in Wymondham. The detailed requirements by growth location are provide in Table 16-5. Given the range of funding gaps within these areas, the Norwich Housing Market area of South Norfolk and mid South Norfolk area residential schemes will generally only be able to achieve the tariff rate required to cover the funding gap in strong market conditions, on agricultural sites with no alternative use value, and where housing grant is available. However this will require landowners to agree to sell their land at significantly lower values in comparison to those that have been achieved previously.

Attachment 4: Extract from the greater Norwich Development Partnership's Affordable Housing Viability Study (July

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2010)

7 Benchmarking: Our Approach

7.1 Introduction

Assessing the propensity of each individual landowner within the Policy Area to sell their site is effectively impossible. There are an indeterminable number of variables and personal circumstances to consider, many of which could not be quantified or modelled as part of a 'high level' study such as this.

That said, a study such as this must, as stated in PPS3, "reflect an assessment of the likely economic viability of land for housing within the area". That is not to say that it must consider every conceivable site in the policy area, but the types of 'likely' sites. The accepted benchmark measure is the relationship between EUV and residual land value.

Brownfield

For Brownfield sites, arriving at a benchmark is relatively straight forward. A recent planning case law decision (Berkeley Homes vs West Oxfordshire District Council) suggested that a reasonable uplift was considered to be 10%. There is little other guidance regarding the quantum of uplift from EUV. We have taken a prudent approach and assumed 15% as a reasonable uplift from each of the three Brownfield EUVs listed in Section 6.5.

Greenfield

The comparison with Greenfield sites is more complex. The EUV of, for example arable land, is typically low when compared to land with other uses. The uplift that the landowner would expect depends greatly on the perceived likelihood of gaining a planning consent for development. A key factor in determining this is whether or not the site is allocated (identified in a Regional or Local Plan as being earmarked for future development).

We propose to benchmark against three types of Greenfield land:

Greenfield - unallocated

Greenfield - allocated (lower value)

Greenfield - allocated (higher value)

Unallocated Greenfield land may be bought speculatively for a developer's land bank. Such land can transact for between £10,000 and £200,000 per hectare, or around x1 to x15 of the Greenfield EUV in the previous section. The price tends to increase as the perceived chance of gaining consent increases. We propose to use the mid point, £100,000.

When a Greenfield site is allocated the market's perceived risk of gaining planning consent is reduced, but significant risks remain. The value of such sites can vary greatly due to a wide range of factors. We have sought to estimate two reasonable benchmark values. In doing this, we have had regard to a number of things, such as:

current site availability;

guideline/average published prices;

the costs and risks involved in buying Greenfield land for residential development;

residual appraisal analysis; and

the value of unallocated Greenfield land.

The VOA's average land price for Norwich, as published in January 2010 was £1,700,000 per hectare, for "a Greenfield suburban site of 0.5 hectare, ripe for development with planning permission being available". The VOA state that their land prices are intended to be "illustrative rather than definitive", and in our view tend to be based on historical transactions.

Greenfield sites currently available include a site for sale with planning consent in Sprowston. The site amounts to 1.7 Ha site and is available for £2,500,000 (£1,470,000 per hectare asking price) with residential consent.

We have sought to balance landowners' return with the risks associated with buying Greenfield land for residential development. These include, but are not limited to: planning risk; potential for unforeseen and abnormally high infrastructure costs; promotion costs; changeable timescales; political risk; and occasional reliance on other sites to deliver.

With this in mind, the benchmarks we have chosen are:

Greenfield - allocated (lower value): £500,000 (30 times EUV)

Greenfield - allocated (upper value): £750,000 (50 times EUV)

These measures are several multiples of EUV, and around a third to a half of the approximate value of Greenfield land with consent.

Summary

In summary, our benchmarks are:

Type of site EUV Reasonable Uplift Benchmark

Brownfield - high £1,500,000 15% £1,725,000

Brownfield - mid £1,000,000 15% £1,150,000

Brownfield - low £500,000 15% £575,000

Greenfield - allocated, upper value £15,000 x 50 £750,000

Greenfield - allocated, lower value £15,000 x 33 £500,000

Greenfield - unallocated £15,000 x 7 £100,000

Where our calculated residual land value is less than EUV, we have assumed it is not viable and if it is in excess of the Benchmark, we have deemed it viable. For land values between EUV and the Benchmark, we have classified them as marginal.

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12192 Object

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Statement of Focussed Changes (Joint Core Strategy)

O - 12193 - 8234 - FC10 - ii

12193 Object

Focussed changes Appendix 5

FC10

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary: FC10 Pt. 5 & Accompanying Plans

The Growth Triangle incorporates fragmented landscapes that need to be enhanced to create wildlife corridors and usable space for future communities. Proposed open space and landscape designations need to be multifunctional to fulfil the functions required without creating dispersed communities. Existing landscape designations therefore need to be reviewed in order to enable appropriate development, a position that has not occurred at present. It is accepted that this is part of the evidence base that will feed into the creation of the Growth Triangle AAP. However, a comment to this effect needs to be incorporated within the Joint Core Strategy. The plans attached to FC 10 also need amending to indicate this position - i.e. that the current identified 'green space/landscape value' areas are not inflexible.

Works required to become sound

Additional comments to indicate that consideration towards the integration and function of any open space and separation areas within the Growth Triangle will be considered as part of the analysis for the development. Existing landscape designations will be reviewed and amended as appropriate.

Down play the apparent automatic protection of existing landscape designations as identified on the plans accompanying FC 10.

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O - 12194 - 8234 - FC10 - i, ii

12194 Object

Focussed changes Appendix 5

FC10

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary: FC10 Pt. 26, 45 & 47

Incorporation of orbital link roads within the growth area is fundamental to the creation of new communities that integrate effectively with the established settlements. The retention of the allocation for such a road between the Sprowston fringe and Broadland Business Park, as well as consideration of similar schemes within the Rackheath development area is strongly supported. In order to create these important links, the Council should be open to suitable development to support these substantial infrastructure projects.

In order to cover the potential that insufficient funding will be available for completion of the NNDR, additional consideration and weight should be afforded to the insertion of orbital links to create a network capable of replacing missing elements of the NNDR should this position arise. This should have the capacity to provide in excess of the 2,200 dwellings indicated in point 45. Orbital roads have the potential to play a vital link within enabling new communities, including supporting the provision of public transport. This needs to be fully recognised within the Joint Core Strategy and incorporated into any fallback solution within the forthcoming Growth Triangle AAP.

Works required to become sound

Further evaluation of potential for orbital roads to replace sections/all of the NNDR if funding is not available. Identification of sufficient information to indicate that the Growth Triangle is developable at the level proposed without the NNDR.

Statement of Focussed Changes (Joint Core Strategy)

O - 12196 - 8803 - FC10 - i, ii

12196 Object

Focussed changes Appendix 5

FC10

Respondent: Lothbury Property Trust Company Ltd (Mr Peter Wilkinson) [8803] **Agent:** N/A

Full Text:

Summary:

The basis for the direction for growth is founded on provision of the North Norwich Distributor Road (NNDR). This is outlined in FC 10 point 1, as well as within other sections of the Core Strategy. At present, there is a funding shortfall of £40 million, as discussed and recorded in the Joint Core Strategy Inspector's Conclusions from the Exploratory Meeting (page 10).

It is identified in points 26, 45 and 47 that orbital links need to be inserted to strengthen connectivity within this area, and that existing links plus those identified in the Local Plan will enable 2,200 dwellings to be constructed. Should funding not be available for part or all of the NNDR, a fallback solution is to consider orbital roads to enhance connectivity, funded principally by developers. Provision through linked discrete elements within developments will substantially reduce the costs to a level that can be supported by development without requiring substantial Government finance. This, coupled with enhancements to public transport along arterial links, should assist in reducing reliance on the private motor vehicle to enable construction of more than the 2,200 dwellings indicated. Alternative options for development without the NNDR or only partial completion of the NNDR, need to be outlined in the AAP for the Growth Triangle as a secondary option. This is required in order to ensure housing delivery, thus creating the flexibility, deliverability

and robust evidence base required in order to comply with PPS 12. Without such inclusions the premise of the Growth Triangle is neither justified or effective and thus does not comply with the Tests of Soundness set out in the box accompanying paragraph 4.52 of PPS 12.

Works required to become sound

Identify in more detail how land is to be developed if funding is not available for NNDR, clarifying the potential to utilise integrate orbital link roads for connectivity.

Statement of Focussed Changes (Joint Core Strategy)

O - 12198 - 8800 - FC10 - None

12198 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs Ray & Maureen Anderson [8800]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12200 - 8268 - FC10 - None

12200 Object

Focussed changes Appendix 5

FC10

Respondent: RSPB (East of England Regional Office) (Dr Philip Pearson) [8268] **Agent:** N/A

Full Text:

Summary:

Comments relating to the proposed new text in Appendix 5 (FC10) Paragraph 5 of 'Development Proposals' in Appendix 5 (p. 13) state that development delivery will "minimise its detrimental impacts upon the environment in all its guises." With regard to The Conservation of Habitats and Species Regulations 2010 (the Habitats Regulations) development must avoid adverse effects to the environment, not simply minimise them. This text should be amended accordingly. The RSPB is supportive of the need to protect existing habitat features such as woodland (p. 16 of Appendix 5), as they can provide both biodiversity benefits and provide recreational opportunities. We are particularly pleased that Thorpe End, Brown's, Belmore and Racecourse Plantations have been mentioned, as this area has been identified as a Green Infrastructure Priority Area. Any forthcoming applications should consider the aspirations for this area within longer-term, strategic planning documents.

Statement of Focussed Changes (Joint Core Strategy)

O - 12202 - 8803 - FC10 - ii, iii

12202 Object

Focussed changes Appendix 5

FC10

Respondent: Lothbury Property Trust Company Ltd (Mr Peter Wilkinson) [8803] **Agent:** N/A

Full Text:

Summary:

The proposed amendment seeks to provide a masterplan document for the urban extension as a Supplementary Planning Document (SPD), rather than an Area Action Plan (AAP). Designation as a SPD circumnavigates the ability for independent examination of the policy, to the potential detriment to anyone with an interest in the urban extension beyond the Council. A detailed document outlining the masterplan for such a proposal should be esignated as an AAP, as specified in paragraph 5.4 of PPS 12. Paragraph 6.1 clearly identifies that the Council's designation of this work as appropriate for a SPD is incorrect. SPD's are designed to add detail to established policy, not act as a tool for comprehensive land designations and masterplans of sizable urban extensions. The necessary consideration and impact resulting from the Growth Triangle is far too great to be contained within a SPD. The Inspector's Conclusions from the Exploratory Meeting for the Joint Core Strategy also queries this amendment (page 13). This proposal therefore conflicts with national policy and thus fails the Tests of Soundness as set out in the box accompanying paragraph 4.52 of PPS 12.

Works required to become sound

Indicate that the document that will contain further details for development of the urban extension will be an AAP.

Statement of Focussed Changes (Joint Core Strategy)

O - 12206 - 8804 - FC10 - None

12206 Object

Focussed changes Appendix 5

FC10

Respondent: Roger and Julie Aspland [8804]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12209 - 8805 - FC10 - None

12209 Object

Focussed changes Appendix 5

FC10

Respondent: Ms Hilary Howells [8805]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12211 - 8018 - FC10 - i, ii, iii

12211 Object

Focussed changes Appendix 5

FC10

Respondent: Norwich Green Party (Mr Stephen Little) [8018]

Agent: N/A

Full Text:

Summary: As a basis for this response, we are using the Conclusions from the Exploratory Meeting and assessing whether the Focussed Changes have successfully addressed the points raised.

Transportation and the Northern Distributor Road

As a general comment, the Inspectors question the description of 80 infrastructure projects as 'critical' when we cannot at present be 'reasonably assured' of their delivery. Many projects are intended to have been completed by 2016 and yet likely significant cuts in government funding must make their deliverability more questionable than when the document was submitted. We know this to be the case with the NDR project and its description as critical in the context of recent government announcements reviewing its funding must seen as a challenge to the soundness of the strategy as a whole.

Our previously expressed concerns about the NDR still stand, only now the added uncertainties of funding make it all the more crucial that an alternative plan that doesn't include an NDR is considered. The proposed changes do not go far enough to address the Inspector's concerns that 'in the early stages of the plan, the NDR could generate increased car dependency' and that the relatively detached location of the Rackheath eco-town will not benefit from 'high quality, regular services' at an early date. The changes only talk of introducing a 'high quality conventional bus service' from the first phase of the project. There is not enough detail here of what 'high quality' exactly means and it seems to be the opinion of the Inspectors that only a 'turn up and go' service would really be enough to encourage a modal shift away from car use and achieve such aspirations as described in paragraph 46 where 1000 dwellings at Rackheath are expected to 'demonstrate half the amount of car-based trips when compared to a conventional housing development'.

The mention of paying attention to the 'permeability' of the road in the changes only highlights that this form of road is completely unsuitable to be passing through a settlement. A level of permeability suitable for an urban area is simply impossible with a road of this nature and it will only be a hindrance to accessing areas by walking and cycling.

The focussed changes still talk of an aspiration for the provision of a tram-train but we would repeat the fact that almost no work has been done to take this beyond the concept stage. This is in line with the Inspectors' comments that 'this option has not been considered in any depth. They also correctly point out that there is 'very little commitment...as yet' to the relocated station to service the Rackheath eco-town.

It is also not entirely clear how, in respect of the growth triangle to the north-east, the Bus Rapid Transit will effectively service all four 'quarters' of the proposed development. The Inspectors specifically consider that provision of a 'turn up and go' bus service is crucial to deliver a step-change away from car use and it is essential that the pattern of development is not so dispersed as to make such provision unviable. (It has to be pointed out here that the very particular concerns in this respect expressed about the South Norfolk area by the Planning Inspectors have not been addressed at all in the Focussed Changes).

Green Infrastructure

The Inspectors stated a need for the JCS 'to set out with greater clarity the purpose and deliverability of green infrastructure...' The focussed changes should have applied this to the South Norfolk area as well as to the north east growth triangle.

The changed version talks of the 'protection of the existing important assets including trees, copses and woodland.....and County Wildlife Sites'. It also talks of protecting sensitive sites with buffer zones and goes on to say that 'the landscape setting of Thorpe End, Brown's Belmore and Racecourse Plantations could form the basis of an extensive network of green spaces....'. However, in our response to the Regulation no 25 consultation, we questioned whether the integrity of existing policy in regards to protection of important sites would be respected in practice. Recent events have proven such concerns to be well-founded. The Belmore Park Charette proposals seem to directly contradict the JCS's aspirations by proposing to build directly on the aforementioned woodland sites which are currently designated as County Wildlife Sites. This very much throws into question the policy strength of the strategy.

The proposal for only 3.5ha of allotments to service the Rackheath development is, in our view, inadequate. We would argue it should be a feature of new development that substantial green space is 'designed in' to accommodate allotments.

Sustainability Issues - Energy Efficiency

The focussed changes envisage that the growth area's new buildings should 'achieve high standards of environmental sustainability'. We would argue that the stated policy to achieve Zero Carbon status by 2015 for all new development should be retained. We do accept that, in present market conditions, there are viability issues. However, factors such

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O - 12211 - 8018 - FC10 - i, ii, iii

12211 Object

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FC10

as the changing policy framework around energy generation (eg introduction of the feed in tariff), the fact that conventional forms of power generation are almost certain to become relatively more expensive and expected improvements in the economic outlook are likely to contribute to making this aspiration realisable. The Inspectors are right, however, to draw attention to the dangers of biomass crops supplanting food production and the strategy should specifically favour other forms of renewables.

We would also still argue that the strategy should make a specific link offsetting the energy used in new development with energy efficiency improvements in existing dwellings, thus ensuring that there is no net increase in the area's carbon output from new development.

Sustainability Issues - Water

In so far as this relates to the North East growth triangle, we would concur with the Planning Inspector's concerns over the 'impacts on the quantity and quality of water courses, including the Broads...' We would also draw attention to the very fundamental concerns expressed by the Environment Agency, Natural England and the Broads Authority in response to the Water Cycle Study, particular in respect of the 'planned deterioration' of water quality. As well as identifying substantial investment in sewerage facilities ahead of any significant development, the impact of new housing growth on water supply should be offset by water efficiency improvements in existing dwellings. Water neutrality and a commitment to no overall increase in water usage should be guiding principles of the growth strategy.

General Note

It has to be pointed out that in the Forward to the Focussed Changes, it is stated that the Planning Inspectors recommended a 'small amount of additional work'. We believe this to be rather an understatement considering the often fundamental nature of the points raised. It is also the case that the Focussed Changes have not addressed all the points raised by the Inspectors, particularly as regards the distribution of settlement in South Norfolk and the proposed development at Long Stratton. It is unfortunate that this consultation only gives us the chance to comment on changes that have been made and offers us no opportunity to suggest those that should have been made.

Over the course of the consultation process we have raised many concerns relating to topics such as: the Northern Distributor Road; the distribution of settlement; the planned level of growth; protection of environmental assets and provision of green infrastructure; the effect on water supply and quality; and increased levels of carbon emissions. We believe these concerns to be of a sufficiently fundamental nature to necessitate the complete withdrawal and reconsideration of the current strategy.

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O - 12214 - 8806 - FC10 - None

12214 Object

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FC10

Respondent: Mr C S Spelman [8806]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12218 - 8807 - FC10 - None

12218 Object

Focussed changes Appendix 5

FC10

Respondent: Nicolette Mary Richards [8807]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12220 - 8808 - FC10 - ii

12220 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Clifford Legett [8808]

Agent: N/A

Full Text:

Summary:

10 promises 'Enhanced walking and Cycling'. This is not good enough. Burrows engineering on Rackheath industrial Estate uses the quiet roads within the proposed development triangle for Cycle development. The owner Mike Burrows is to Cycling what Colin Chapman was to Motoring, and recently broke the world speed record for a partially faired cycle. A high speed cycle link ideally engineered for the 45mph cruising speed achievable by high efficiency cycles, linking the development triangle to greater Norwich is required to avoid the loss of this world leading facility, as is currently planned.

15 promotes a business model ' building upon the eco credentials of the area' Following my comments regards 10
Given the exposed location: How many wind turbines will be sited within the development triangle??
Given the close proximity of rivers how many water mills are planned??
Given the close proximity to the broadland reed beds: What quantity of biomass will they provide??

Statement of Focussed Changes (Joint Core Strategy)

O - 12223 - 8810 - FC10 - None

12223 Object

Focussed changes Appendix 5

FC10

Respondent: Roger Dobson [8810]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

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O - 12228 - 8812 - FC10 - None

12228 Object

Focussed changes Appendix 5

FC10

Respondent: Christopher and Gaynor Peck [8812]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

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O - 12231 - 8809 - FC10 - i, ii, iii

12231 Object

Focussed changes Appendix 5

FC10

Respondent: Landstock Estates Ltd & Landowners Group [8809] **Agent:** Barton Willmore (Mr Andrew Wilford) [8811]

Full Text:

Summary:

1.1. These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group in response to the Greater Norwich Development Partnerships (GNDP) consultation on its 'Statement of Focussed Changes' (SoFC). It is our understanding that the SoFC has been specifically published to address what the GNDP considers are those issues that require further changes following the articulation by the Inspectors' of their concerns over the submitted Joint Core Strategy (JCS) before, during and after the Exploratory Meeting (EM) held on 13th May 2010.

1.2. The SoFC has been accompanied by two supporting documents, namely, a Sustainability Appraisal Report (July 2010) (SA) prepared by Scott Wilson and an Affordable Housing (AH) Viability Study (July 2010) prepared by Drivers Jonas Deloitte.

1.3. The SoFC only relates to 3 elements of the JCS. These are:

- * Provision of Gypsy and Traveller Pitches;
- * Affordable Housing; and,
- * The North East Norwich Strategic Allocation.

1.4. Representations have been made at every stage of the JCS process; and it is noted that this current consultation can only comment on soundness issues relating to the SoFC. We are mindful of this fact, but would like to remind the GNDP of our ongoing soundness concerns relating to the submitted JCS as set out in our previous representations at the Issues and Options Stage, the Preferred Option Stage and the two Counsel's Opinions.

1.5. In summary, we conclude that the SoFC does not represent an adequate attempt by the GNDP to address the matters of particular concern raised at the EM on 13th May 2010 and as set out in the 15 page Note (EIP 35) circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' (dated 24th May 2010). EIP 35 set out that there were 6 areas of concern on which the Inspectors considered that further work was needed. These related to:

- i) Infrastructure;
- ii) Affordable Housing;
- iii) Distribution of Development, particularly in relation to public transport opportunities;
- iv) Northern Distributor Road;
- v) Sustainability Issues; and
- vi) The North-East Growth Triangle.

1.6. It is therefore surprising that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 (EIP 36) to clarify and note the Inspectors' concerns and set out the GNDP's suggested way forward on a number of these matters.

1.7. Notwithstanding our concerns regarding the additional matters upon which the GNDP has chosen not to respond, we set out below our comments on the focused changes, namely, those in relation to affordable housing and the proposed strategic allocation at NE Norwich, and the SA addendum and AH Viability Study that support the SoFC. Even in respect of these matters, alone, we contend that the JCS remains unsound.

- ii) Inadequate Contents for a Strategic Allocation

4.17 Our concerns relating to the inclusion of North East Norwich as a Strategic Allocation do not relate to the principle that this location can or should accommodate this level of growth, but more that the Evidence Base to call North East Norwich a 'Strategic Allocation' is not present. The necessary testing and public consultation have not been undertaken and the critical infrastructure necessary to achieve this level of growth cannot be relied upon. The SoFC goes little way to overcoming these issues, especially when the SA that supports this allocation is in itself an unsound document.

4.18 Paragraph 4.6 of PPS12 states 'Core Strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy.' The Strategic Allocation of North East Norwich is indeed 'central' to the achievement of the strategy. Paragraph 4.7 of PPS12 sets out the requirements of what is expected of a strategic site 'they must include a submission proposals map.' Paragraph 4.10 also sets out in relation to infrastructure that: 'It is important therefore that the Core Strategy makes proper provision for such uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning - showing how the objectives will be achieved under different scenarios - may be necessary in circumstances where provision is uncertain'. Paragraph 4.11 advises: 'infrastructure planning for the core strategy should also include the specific infrastructure requirements for any strategic sites which are allocated in it.' This issue is further explored in paragraph 4.25 below.

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4.19 By way of example of the concern over the evidence base, in preparation for the EM, the Inspectors released 24 Questions (EIP) which they considered necessary to be explained by the GNDP in order to demonstrate how or why the submitted JCS had been progressed in such a manner. Question 19 asked:

Is there sufficient evidence to justify the clarificatory 'Minor Change' making this a 'Strategic Allocation' with boundaries fixed in the relevant appendix? Will the whole area be delivered under a 'single coordinated approach' master-planned by a consortium covering all of the area, including any part not included in the eco-town proposal? Is the nature/ mix of the development sufficiently firmly established in the JCS to make the proposed change from an AAP to SPD an appropriate vehicle for implementation?

4.20 The notion of the Old Catton/Sprowston/Rackheath/Thorpe St Andrew triangle (i.e. North East Norwich) as a strategic allocation was only introduced by the GNDP at the pre-submission stage, primarily because it is now seen as the only way to fast track delivery. There is no evidence within the JCS process, prior to the Pre-Submission version or the release of the SoFC, which identifies this triangle as a 'strategic allocation'. It is clearly evident that insufficient work had been undertaken prior to the Pre-Submission stage to move forward with a strategic allocation in the North East Norwich. This was clearly identified by the Inspectors and, as such, provoked the above question.

4.21 The GNDP responded (EIP 1) to the Inspectors questions (21st April 2010) ahead of the EM and set out at length the justification for growth in this triangle. However, the specific issue the Inspectors were seeking to be addressed had not been answered nor was it adequately explained at the EM. There has been extensive work undertaken to explore the issues surrounding the level of growth envisaged in this part of the NPA but not necessarily their resolution. More critically, this growth has never been identified within any stage of the JCS as a 'strategic allocation' and as such insufficient evidence exists to conclude on the definitive area of the Strategic Allocation site boundary and masterplan. The area as defined within the Submission version was excessive in terms of land take and no assessment of land take requirement is evidenced. This is still the case within the SoFC document.

4.22 The lack of recognition at the outset has meant that the necessary public participation has not been undertaken in forming the draft policy for this 'strategic allocation.' Therefore, effective consultation in relation to this proposal as a 'strategic allocation' has not been undertaken with either the public or statutory bodies and is therefore unsound, and, something that cannot simply be rectified by producing a new Appendix 5 or an updated SA. Rather, the policy should have emanated from proper consultation and engagement.

4.23 'Strategic Allocations' in Core Strategies require specific information relating to the identification of definitive boundaries and specific policies demonstrating the delivery of that strategic allocation. Whilst the SoFC seeks to re-address within FC10 (as this was non-existent in the submission version of the JCS), the fundamental issue of the lack of public consultation cannot be overcome prior to the Examination.

4.24 The SoFC (Appendix 5) now includes 4 plans identifying the extent of the strategic allocation, areas of green spaces, key transport routes and constraints and opportunities for new development. Whilst a 'fixed' boundary is welcomed and required to be identified as part of any strategic allocation within a Core Strategy, we question, as no previous consultation has been undertaken nor any technical assessment, how has the GNDP established that this boundary is correct? As the provisions of PPS12 paragraphs 4.7, 4.9 - 4.11 and the guidance contained in Examining Development Plan Documents: Learning From Experience (September 2009) have not been adequately addressed new Appendix 5 is unsound on the basis that it is 'not founded on robust and credible evidence base, and, not 'the most appropriate strategy when considered against reasonable alternatives' (paragraph 4.36 of PPS12).

iii) Failure to Meet Inspectorate Guidance

4.25 The Planning Inspectorate Document entitled 'Examining Development Plan Documents: Learning From Experience (September 2009), sets out what it expects of a strategic allocation in a Core Strategy. It states in paragraph 31 '...For a site anticipated in the early years of the plan there is an expectation that the detailed delivery matters such as availability and infrastructure requirements will have been resolved. Matters that impact on the rest of the plan area (such as scale and nature of development) will also need to have been resolved'

4.26 In reviewing the 4 plans, there is no demonstration how it is expected that the Strategic Allocation will be delivered in one concept masterplan. The diagrams do not indicate land which is available and is expected to be relied upon and delivered to meet this growth. This is an unsound approach.

4.27 The strategic allocation area contains a considerable element of organised recreation and sport fields uses i.e. the Norwich High School Playing Fields and Norwich Rugby Club. Little public consultation has taken place on specific land uses in the area and consequently the identification of fixed boundaries may have to alter to retain these uses or to re-site them. In addition, it is alarming to note the intention to "take" a significant amount of Grade 2 Agricultural land on the Norwich Fringe area and suggest it suitable for development. It is interesting to note that the land owner is Norfolk County Council (a body represented on the GNDP) and that this land forms part of their Agricultural Holding Unit.

4.28 It is not clear how these existing protected areas will either relate to the new development or be protected. With the lack of an overall concept masterplan for the area, how can it be ensured that the Strategic Allocation will be developed in a suitable and phased manner addressing all the necessary infrastructure and environmental constraints?

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A concept masterplan, supported by a robust and credible evidence base and informed by consultation and engagement, ought to be available now, ahead of the decision to include a fixed 'Strategic Allocation' to ensure, in broad terms, the amount of land required for the level of housing growth, employment and open space is available.

4.29 Paragraph 50 of FC10, identifies 'further detail of the proposals will be worked out through an overarching high level masterplan in the form of a Supplementary Planning Document'. We consider this high level masterplan should be available now, for inclusion in the JCS. It is the role of the SPD to work up greater detail the masterplan based upon the principles set in the JCS rather than, as here, that no such masterplanning exercise has yet been undertaken.

4.30 Furthermore, the boundary outlined in the growth triangle incorporates the proposed Northern Distributor Road (NDR) of which the environmental impacts do not appear to have been fully considered in setting the boundary of the Strategic Allocation as proposed. It is evident that the boundaries of the Strategic Allocation have emerged on the basis of a "search area" as opposed to a specific site allocation. Through the course of the JCS process, this area has been labelled a growth location and then refined later into a "strategic allocation" in desperation in view of the "pressure to deliver growth quickly" and in this case at all costs. However, the scale of the proposed strategic allocation is reliant upon the delivery of the NDR and all other infrastructure requirements and no sensitivity has been written into the policy to accommodate any flexibility in the event that the NDR is not delivered. This is a fundamental shortcoming of the JCS and not in accordance with the "effective" test of PPS12 in that it is neither flexible nor deliverable.

4.31 The Inspectorate Guidance on Learning from Experience (2009) is clear that all infrastructure requirements must have been resolved to allow for a 'Strategic Allocation'. The growth of North East Norwich is reliant on the delivery of the NDR. Paragraph 44 of FC10 confirms this is the case, and yet in the same paragraph confirms 'there cannot be commitment to large scale development in the growth triangle until there is sufficient certainty over the construction of the NDR.

4.32 However, in paragraphs 10 and 44 of FC10, the SoFC claims the NDR is 'committed and has been awarded programme entry status by DfT'. The delivery of this 'critical' infrastructure has been well documented and was recently addressed by the Department of Transport in its letter dated 10th June 2010 (EIP 55). EIP 55 sets out that due to funding cuts being made by the Coalition Government, Ministers have 'decided to suspend the Local Major Scheme Guidance and process at least until the conclusion of the spending review in Autumn'. It continues 'the Department can give no assurances on its intention to fund any schemes awarded Programme Entry by the previous Government. This includes the Norwich Northern Distributor Road'

4.33 We therefore question how the SoFC can conclude that there is certainty over the delivery of the NDR and therefore a sound approach to include a Strategic Allocation in the JCS? In the light that the SoFC contradicts itself on the basis that the NDR is recognised as critical to the growth triangle and yet there is uncertainty of its delivery, the guidance as set out in paragraph 31 of the 'Learning From Experience Document' in that infrastructure issues should be resolved, and the recent DfT correspondence effectively removing any funding from the NDR, how can the JCS include a Strategic Allocation?

4.34 The Planning Inspectorate has emphasised, within LDF's Lessons Learnt (June 2007), that: "At examination, LPAs will need to show a clear trail of options generation, appraisal, selection or rejection and the role that Sustainability Appraisal (SA) and community engagement have played in this process"

4.35 We are concerned that the current SA does not demonstrate or test the 'suitable alternatives', and, that insufficient scoping or public consultation has been undertaken to allow an appropriate time frame to express opinions. Given the lack of a 'Plan B' in this current consultation, or how the preferred strategy was reached (and supported by an SA), we therefore question how sufficient consultation could now take place in accordance with the SEA Directive before the Examination starts in early November.

4.36 Although attention was drawn to these major procedural shortcomings in our letter dated 2nd August 2010, their significance has yet to be appreciated, and was certainly absent in the GNPD's reply dated 6th August 2010 (copy letters attached in Appendix C).

5.1 Our view of the soundness of the JCS is well documented in previous representations and engagement at the EM on 13th May 2010. It is still clear that the matters of Affordable Housing and the Strategic Allocation remain unsound. There is no doubt that the short consultation on these issues has not repaired the position as outlined by the Inspectors. The real problem is that with a front loaded plan which has been developed over a number of years, it is impossible to play catch up on such significant issues.

5.2 The SoFC fails to address all the outstanding issues as set out by the Inspectors and has attempted to retro-fit the Sustainability Appraisal and JCS to suit the inclusion of the 'Strategic Allocation' and justification for the current level of Affordable Housing.

5.3 The JCS continues to be unsound, and the GNPD have failed to adequately consult on the SA or undertaken the very basic necessity of scoping correctly to allow an updated SA to be undertaken.

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Appendix B

Environmental Assessment of Plans and Programmes Regulations 2004
(reg 12(2)(b) and Sched. 2, para. 8)

Preparation of environmental report

12. - (1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of -

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of -

(a) current knowledge and methods of assessment;

(b) the contents and level of detail in the plan or programme;

(c) the stage of the plan or programme in the decision-making process; and

(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

(4) Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other Community legislation.

SCHEDULE 2 Regulation 12(3)

INFORMATION FOR ENVIRONMENTAL REPORTS

1 An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.

2 The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

3. The environmental characteristics of areas likely to be significantly affected.

1 Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds^[10] and the Habitats Directive.

2 The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

3 The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as -

(a) biodiversity;

(b) population;

(c) human health;

(d) fauna;

(e) flora;

(f) soil;

(g) water;

(h) air;

(i) climatic factors;

(j) material assets;

(k) cultural heritage, including architectural and archaeological heritage;

(l) landscape; and

(m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).

1 The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

2 An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Appendix C

Copy Letters between BW and GNDP

Sandra Eastaugh

Statement of Focussed Changes (Joint Core Strategy)

O - 12231 - 8809 - FC10 - i, ii, iii

12231 Object

Focussed changes Appendix 5

FC10

GNDP Manager
PO Box 3466,
Norwich,
NR7 7NX
02 August 2010

16197/A3/AW/mg

Dear Mrs Eastaugh

GREATER NORWICH DEVELOPMENT PARTNERSHIP JOINT CORE STRATEGY STATEMENT OF FOCUSSED CHANGES JULY 2010

We refer to the public consultation currently being undertaken by the GNDP relating to the Statement of Focussed Changes (SoFC) July 2010. We record that the SoFC, along with a supporting Sustainability Appraisal (SA) report (July 2010) and an Affordable Housing Viability Study (July 2010) have been released in response to the 'Inspectors' continuing concerns following the Exploratory Meeting (EM) on 13th May 2010 and future Examination in Public.

This letter does not set out our clients' formal representations to the current consultation (these will follow at a later date) but seeks to highlight to the GNDP our continuing concerns relating to the current SoFC and its failure to address the other issues that formed part of the EM in May 2010, bearing in mind the short timescales before the Examination opens in early November.

We have 3 main areas of concern:

1. The "Focussed Changes" Upon Which Consultation Is Taking Place

We are concerned that the focussed changes only relate to 3 elements of the Joint Core Strategy (JCS). These are:

- i) Provision of Gypsy and Traveller Pitches;
- ii) Affordable Housing;
- iii) The North East Norwich Strategic Allocation.

It was clear at the EM and the 15 page Note circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' dated 24th May 2010, that there were 6 areas of concern. These related to:

- vii) Infrastructure;
- viii) Affordable Housing;
- ix) Distribution of Development, particularly in relation to public transport opportunities;
- x) Northern Distributor Road;
- xi) Sustainability Issues; and
- xii) The North-East Growth Triangle.

It is therefore disappointing that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 to clarify and note the Inspectors concerns and set out the GNDP's suggested way forward on a number of these matters.

As mentioned above, our representations on these matters will follow in due course in accordance with the consultation timetable. However, we consider the current SoFC does not adequately address all the areas of concern that are required to be consulted upon in order to 'repair' the JCS in its current format. At the very least, by way of example, the SoFC should have published for consultation what the GNDP consider to be the 'critical' infrastructure versus 'non-critical' infrastructure so that the services authorities could comment on this particular issue.

2. Timeframe to Examination

We have noted the anticipated timescales set out in the SoFC and seek clarification on these specific dates. We recognise the current consultation period ends on 30th August 2010 relating to the SoFC but that on 4th October 2010 (5 weeks after the close of the consultation) further information will be submitted to the Inspectors by the GNDP. We understand this will relate to the background evidence work currently still being progressed.

We question at what point consultation will take place on these additional documents? Given that this date is only 4 weeks ahead of the proposed start date of the Examination, we do not consider this is an appropriate or fair timetable to review the additional documentation. This is especially so when the current SoFC contains little information that relates to the 6 areas of outstanding issues as identified by the Inspectors.

Recent correspondence sent to the GNDP from the Inspectors (23rd July 2010) has questioned the GNDP's approach to the JCS in the light of recent Government Changes. The Inspectors have identified that 'It would be helpful if this

Statement of Focussed Changes (Joint Core Strategy)

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paper could be made available as an examination document before 23 August so that we can take account of it in our invitation to participants to respond in writing to the matters that we will be identifying for discussion at the hearings.'

It is perfectly clear from this request that the Inspectors require sufficient time to review the response and determine an appropriate course of action. We therefore question how new examination documents can be submitted to the Inspectors as late as the 4th October i.e 4 weeks prior to the start of the examination. Can these documents be suitably and adequately considered by the Inspectors as well as providing a period of consultation to allow representations to be made? The Inspectors have clearly identified that the 23rd August is an appropriate timescale to consider new matters; and yet the current timetable suggests that information will be submitted up to 6 weeks after that date.

The "Local Development Frameworks Examining Development Plan Documents: Procedure Guidance August 2009 (2nd Edition)" sets out in paragraphs 3.6 - 3.9 the appropriate timeframes and manner in which to conduct the pre-hearing meetings, the content and deadline for the submission of statements by participants and the proposed timetable for the hearing. In all, the pre-hearing meeting should take place approximately 6 weeks in advance of the opening of the examination.

Notwithstanding, the Inspectors have identified that a further pre-hearing meeting is not required (11th June 2010) ahead of the Examination. Given that the GNDP intend to submit new information in early October, the Inspectors are likely to require 2 weeks to consider and conclude on these documents and prepare for the Examination. They must also ensure that all parties have approximately 4 weeks to prepare their additional statements and a further 2 weeks for the Inspectors to familiarise themselves with those statements. Realistically, some 8 weeks must elapse between the submission of the GNDP's further findings to the opening of the Examination.

Nevertheless, on 11th June 2010, the Inspectors sent an email to the GNDP and stated 'As my guidance material for the PHM made clear, the Inspectors intend to provide participants with an opportunity to respond in writing to the list of matters that we will identify for the hearings. We plan to issue this on or about 16 August, by which time any proposed changes will, by your own timetable, have been advertised, with responses to be submitted within 4 weeks (ie by 13 September).'

The current timetable does not conform with the Inspectors request as table 1 below demonstrates that the Inspectors intend to circulate Inspector Matters either on the 16th August or, based on their most recent correspondence, after 23rd August with a maximum of 4 weeks to respond to matters. This deadline is either 13th September or sometime shortly after 20th September (based on latest correspondence). It is evident the timetable for the JCS is running ahead of the democratic process of the GNDP and the participating Local Authority bodies as each Authority (including the GNDP itself) does not have a Committee Meeting to agree the representations received and any necessary changes to the SoFC before representations on matters arising are submitted. Furthermore, at present, the Written Statements that will form the basis of the hearing sessions are required to be submitted before the GNDP has submitted all the evidence on 4th October 2010.

Table 1: Current Event Timetable for JCS Examination

Event
Date Source
Consultation on SoFC 19th July - 30th August 2010 SoFC
Circulation of Inspectors Matters Arising 16th August 2010 Email from PO to GNDP dated 11th June 2010
Submission of Statement in response to Inspectors Questions re. Government Changes 23rd August 2010 Inspectors letter dated 23rd July 2010
Responses required to be submitted to Inspectors based on matter arising 13th September 2010 Email from PO to GNDP dated 11th June 2010
Policy Group meeting 23rd September 2010 SoFC
Broadland DC Meeting 28th September SoFC
Norwich City Council Meeting 28th September 2010 SoFC
South Norfolk District Council Meeting TBC SoFC
Submission of Additional Documents to the Inspector 4th October 2010 SoFC
Norfolk County Council Cabinet Meeting 11th October 2010 SoFC
Examination in Public 8th - 19th November 2010 SoFC
Adoption March 2011 SoFC

Given that the Inspectors require written statements to be submitted 4 weeks after the circulation of Matters, and some 4 - 5 weeks ahead of the start of the Examination (based on the 11th June 2010 correspondence) it is therefore unlikely

Statement of Focussed Changes (Joint Core Strategy)

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that the Examination can safely commence in early November if the GNDP intend to submit new information in October.

3. Sustainability Appraisal

One fundamental issue that surrounded the soundness of the JCS and which was discussed at length at the EM was the lack of flexibility in providing for an 'alternative' or fallback strategy (or a Plan B). An alternative strategy or 'Plan B' was considered necessary to be explored in the light that a number of locations identified for growth are reliant on the delivery of infrastructure projects such as the Northern Distributor Road or the Long Stratton Bypass.

It was therefore expected that the GNDP would assess the preferred strategy against reasonable alternatives to demonstrate that a) the preferred approach selected was the most suitable and b) in the light of the failure to deliver the infrastructure projects, how would the plan continue with the delivery of the housing and employment growth. This was described as the 'what if' scenario in the Inspectors Guidance.

We have noted that these 'alternative' options' have not been presented within the current SoFC nor tested within the current SA (July 2010). Under the SEA Directive: "Where an environmental assessment is required... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (our emphasis)

The SA (July 2010) has only assessed two options for the North East Norwich Growth Area namely:

Option 1: Strategic Site; and

Option 2: Non-Strategic Site.

This is a fundamental shortcoming of the SEA process undertaken by the GNDP as no suitable 'alternative options' (i.e. Plan B) has been tested against the inclusion of the delivery of a Strategic Allocation. Our views on the original Sustainability Appraisal are well documented in previous representations to the JCS process.

Furthermore, the SA (July 2010) relies on the original Scoping Report for the JCS dated 2007. This scoping report does not provide for an assessment of a 'Strategic Allocation' and therefore the current SA (July 2010) is not in accordance with the scoping report on which it has been based. A scoping report addendum testing further alternatives should have been prepared. We would suggest that Scott Wilson need to explain how this can proceed to a formal report without an up to date scoping report.

The SEA Directive requires that 'authorities with environmental responsibilities and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme'.

The Planning Inspectorate has further emphasised, within LDF's Lessons Learnt (June 2007), that: "At examination, LPAs will need to show a clear trail of options generation, appraisal, selection or rejection and the role that Sustainability Appraisal (SA) and community engagement have played in this process"

We are concerned that the current SA does not demonstrate or test the 'suitable alternatives', and, that insufficient scoping or public consultation has been undertaken to allow an appropriate time frame to express opinions. Given the lack of a 'Plan B' in this current consultation, or how the preferred strategy was reached (and supported by an SA), we can only assume that this will be submitted as part of the new evidence to the Inspectors on 4th October 2010. We therefore question how this provides for sufficient consultation to take place in accordance with the SEA Directive.

We request that the further issues (as outlined by the Inspectors above), and, the proposed submission of new evidence are addressed in a more timely fashion in order to allow all interested parties the opportunity to review and comment ahead of the forthcoming Examination.

Yours sincerely

LEE NEWLYN
Senior Partner

cc: Phil Kirby : Broadland District Council
Paul Rao : Norwich City Council
Andrew Gregory : South Norfolk District Council
Simon Osborne : GNDP JCS Programme Officer
Graham Tuddenham : Landowners Group
Damon Turner : Landstock Estates

Statement of Focussed Changes (Joint Core Strategy)

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FC10

John Pugh-Smith : 39 Essex Street Chambers

Lee Newlyn
Senior Partner
Barton Willmore
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

6th August 2010

Dear Mr Newlyn,

Greater Norwich Development Partnership Joint Core Strategy Statement of Focussed Changes

Thank you for your letter of 2nd August detailing your concerns over the Statement of Focussed Changes (SoFC) and its timescales.

1. 'Focussed Changes'

All areas raised by the Inspectors are being addressed by either the SoFC, or by drawing together the existing data into other documents that will add clarity and signpost the Inspectors to evidence already submitted.

The Inspectors have not expressed any objections or concerns to the way forward suggested by the GNDP.

The GNDP have been and continue to meet with service providers to discuss the Joint Core Strategy, the growth agenda and their financial planning processes and delivery mechanisms to see if there are common areas where we can work together.

The notes of these meetings will be summarised, collated and shared with the Inspector, the meetings continue through to the autumn and beyond.

2. Timeframe to Examination

The GNDP are working to the timeframe as laid out by the Inspectors. An update on progress towards completing the work in advance of the hearings will be submitted to the Inspectors shortly via the Programme Officer. If the Inspector has any concerns on the timetable he will make us aware.

3. Sustainability Appraisal

Documentation regarding the Sustainability Appraisal will be made available in line with the Inspectors' timeframe.

I note that your letter has been copied to the Programme Officer, who will ensure that your concerns are passed on to the Inspector. Your letter and this reply will be added to the evidence base.

Yours sincerely,

Sandra Eastaugh
GNDP Manager

cc: Phil Kirby, Broadland District Council
Paul Rao\Graham Nelson, Norwich City Council
Andrew Gregory, South Norfolk District Council
Simon Osborne, Programme Officer
Graham Tuddenham, Landowners Group
Damon Turner, Landstock Estates
John Pugh Smith, 39 Essex Street Chamber

Statement of Focussed Changes (Joint Core Strategy)

O - 12234 - 8813 - FC10 - None

12234 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Jonathan Breed [8813]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

S - 12238 - 8057 - FC10 - None

12238 Support

Focussed changes Appendix 5

FC10

Respondent: Highways Agency (Mr Eric Cooper) [8057]

Agent: N/A

Full Text:

Summary:

Focussed change: Policy 10 Locations for major new, or expanded communities in the Norwich Policy Area
3. Focussed change: Appendix 5 Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Area Triangle Concept Statement. It is noted that the proposed change from the production of an Area Action Plan to the provision of a Supplementary Planning Document supported by a concept statement embeds the decision of Broadland District Council to follow this approach as set out in their adopted Local Development Scheme (December 2009). Whilst the Highways Agency has no objection in principle to this approach and accepts the need/desire for increasing housing growth rates, there is some concern that without careful planning, there is a danger that the area will be developed in a piece meal approach rather than taking a holistic view of the whole area and developing overall master planning and implementation policies which would then be subject to independent scrutiny. The Highways Agency has worked with Norfolk County Council on understanding the transport implications of growth in the Norwich area and contributed to the development of the evidence base. In conjunction with this significant work has been undertaken looking at the impacts of growth on the A47 Postwick Interchange and developing a junction scheme which would facilitate the delivery of the proposed Northern Distributor Route and enable delivery of local employment areas (e.g. Broadland Gate). The acceptable conclusions of that work were based on assumptions that the delivery of sustainable growth in the triangle area would significantly influenced by high modal shift away from travel by private car. If the area is developed on a piece meal approach then there is a high risk that sufficient levels of modal shift will not be achieved, the opportunities of economies of scale lost and the highway network will not be able to cope with potential future levels of traffic. Ultimately this could in the long term have a bearing on achieving planning consents for development towards the end of the plan period. Consequently, the Highways Agency's preference is to retain the concept of an Area Action Plan which will focus on the implementation and delivery of the whole area and developing area wide mechanisms which will be subject to independent scrutiny, i.e. the development of a managed process of delivery. If this approach is not taken and there is a more piece meal approach to delivery based on a Supplementary Planning Document, then it will be essential that the local planning authority in pressing forward with early delivery of growth considers at all times the implications of the 'bigger picture' and mechanisms are put in place to ensure this takes place in full consultation with strategic partners.

Statement of Focussed Changes (Joint Core Strategy)

O - 12241 - 8603 - FC10 - ii, iii

12241 Object

Focussed changes Appendix 5

FC10

Respondent: B LANmar 1 LLP [8603]

Agent: Woods Hardwick Planning (Mr Tim Collie) [7449]

Full Text:

Summary:

These comments relate to FC10.

1.2 Our client is objecting to the SFC on the basis that it does not meet the "effectiveness" test of soundness in PPS12 as will be explained in detail below.

Assessment of the Draft Joint Core Strategy for Broadland, Norwich and South Norfolk - Statement of Focused Changes against the soundness test in PPS12.

2.1 The site is within the Old Catton, Sprowstown, Rackheath, Thorpe St. Andrew Growth Area Triangle which is the principle location for growth in the region. It is set to accommodate 7,000 dwellings in the period up until 2026, with 3,000 planned for beyond this date.

2.2 Our client is objecting to the basis that the SFC would not meet the 'effectiveness' test of soundness in PPS12 due to issues with the 'delivery' of the planned growth as undue restrictions have been placed on delivery of the area, which are in turn not consistent with National Planning Policy.

2.3 The Document is also judged not to be 'flexible', as it fails to take into account locations for development that are consistent with policies in other parts of the document, and does not give scope of development in these areas above and beyond the minimum targets when there is a possibility that development in selected locations will not be deliverable within the plan period. The required housing provision would therefore not be achieved, due to the rigidity of the current document.

Test 1 - Deliverable

3.1 The draft document sets aside a large area of land between the urban area of Norwich and the Village of Rackheath, as an 'area of landscape value' with a significant area within this as 'Historic Parks and Gardens'. This has the effect of limiting development in this area, removing the potential to provide housing units and employment land within the defined growth area. The designations adopted by the LPA have no grounds in National Planning Guidance. PPS7 at paragraph 47 states that:

'when reviewing their local area-wide development plans and LDDs, planning authorities should rigorously consider the justification for retaining existing local landscape designations. They should ensure that such designations are based on formal and robust assessment of the qualities of the landscape concerned.' The Historic Parkland identified in this area is not nationally recognized, as it is not on the English Heritage Register and therefore has no justification for its designation. The area identified as an area of landscape value does not conform to the designation of an Area of Outstanding Natural Beauty and also has no justification. In this case the land covered by these designations is therefore classified as open

countryside and brownfield land and should be subject to the normal development control principles, of other open land within the growth triangle, and should be made available for the delivery of the required growth.

The Landscape Character Assessment (2008) defines the landscape of the area as 'wooded estate land' and amongst its recommendations is to respond to the historic settlement pattern and maintain the distinction between the urban edge and villages, with no special protection given to the area or no special sensitivity to development stated, apart from buildings over 3 storeys in height..

Paragraph 41 of the SFC states that the landscape setting in the NNDR will help to maintain the separate identity for Rackheath. Areas along the route have been highlighted for landscaping and planting as part of the plans for the NNDR. However the NNDR team in the Planning and Transportation department of the County Council have confirmed that no landscaping is needed on our client's site, and could be made available for development. In addition the site is likely to become derelict as a result of the storage of material on the site following the construction of the road, and development would remove this risk.

The proposed landscaping would have served no purpose apart from providing continuity with the surrounding woodland, and served no function in historic or special amenity terms and the land should be made available for development. If the historic parks and gardens, or area of landscape value were judged to have national importance in line with the requirements of PPS7, the construction of the road itself should be resisted.

To ensure deliverability in line with the test of PPS12 the Document should ensure that land is not placed under undue restraints for development, that are not justified or in accordance with national planning policy. This will make it difficult to achieve a co-ordinated form of development in order to deliver the large levels of planned growth.

Flexibility

The tests in PPS12 define flexibility as the ability of a plan to respond to changing circumstances over a long time frame (usually 15 years or more). The delivery of housing in the growth triangle is reliant on the construction of the Eco-Town, which in turn will be subject to the construction of the NNDR and improved rail link. A further 6,000 dwellings will need to be provided in the growth triangle outside the Eco-Town.

Little scope is given for time lags in the process or the non delivery of selected sites.

Statement of Focussed Changes (Joint Core Strategy)

O - 12241 - 8603 - FC10 - ii, iii

12241 Object

Focussed changes Appendix 5

FC10

Paragraph 29 of the document gives an indication that 170 - 200 ha will be made available for the delivery of 6,000 dwellings, which will leave little room for error and remove the possibility of having other sites within the growth area in sustainable locations that may deliver housing to meet the targets of the plan.

Paragraphs 49 to 57 of the Statement of Focused Changes and Policy 10 of the draft Core Strategy recommended the production of an overall masterplan and smaller 'daughter masterplans' for the growth triangle so that a comprehensive form of development can be delivered within the growth area as a whole. It is within the context of these documents that the precise locations for growth should be decided rather than the Core Strategy.

The preparation of these masterplans will help to focus development within the growth area, and within the Core Strategy greater flexibility should be given to locations for growth

within this area to aid the preparation of these documents, provide alternatives, and ensure that deliverable sites provide the required levels of growth. As a result a greater amount of land should be made available for the consideration for development within the growth area and the amount of land allocated increased to allow for greater flexibility.

Conclusions

There is a risk that the Core Strategy will be found unsound due to the rigid approach applied to provide land for the delivery of housing. A more flexible approach should be adopted allowing additional land to be made available for development to ensure that the growth targets are met.

The document includes an number of areas protected for landscape and historic reasons that do not meet the national requirements. As well as acting as an impediment to the delivery of growth in the area, the designations do not need the test in paragraph 47 of PPS12.

Statement of Focussed Changes (Joint Core Strategy)

O - 12242 - 8819 - FC10 - ii

12242 Object

Focussed changes Appendix 5

FC10

Respondent: Valori Brothers (Valori Brothers) [8819]

Agent: Keymer Cavendish (Mr E. J. Keymer) [4187]

Full Text:

Summary:

FC 10 -Appendix 5-Paras 10 and 26 -relates to plan at Page 27 'Key Transport Routes'

The plan on Page 27 of the Statement of Focused Changes shows very clearly a link road running northwards from the A47 Postwick Junction up to the Plumstead Road. Further north, it shows a similar section of road running from the Wroxham Road (A 1151) down to the Salhouse Road, shown coloured purple on the plan.

There is a clear 'missing link' between Salhouse Road and Plumstead Road which it is illogical to omit from this plan.

This 'missing link' should be reinstated in order to make this plan logical and sound. please see plan attached showing the link.

We have argued previously that there is over-reliance on the Northern Distributor Road (NDR) and it would be unsound if no development could proceed if, for any reason, government spending cuts delay implementation of the NDR.

In this event, the presence of a lesser-standard link road would, in the short term, serve to facilitate radial movement around the north-east quadrant of Norwich, thus ensuring that early stages of development remain sustainable by facilitating movement by public transport, cycling and walking. This is particularly the case as large employment areas are located close to the Postwick Junction and need to be easily accessible to areas of new housing.

FC 10 -Appendix 5-Para 34 -relates to plan at Page 26 'Areas of Green Space' Due west of Thorpe End, Racecourse Plantation is rightly shown as an Area of Landscape Value and it is ringed in red as a Norfolk County Wildlife Site.

There is, however, an error as illustrated by the blue hatched area on the enlarged section of the plan. This area comprises the former Heath Farm pig buildings and is covered in concrete, derelict buildings, slurry lagoons and other residual impedimenta of pig farming. It might seem irrelevant to point out a matter of detail at this stage, but we otherwise run the risk of the various plans being 'cast in tablets of stone' with no flexibility to reflect conditions on the ground.

If there is to be greater public access to Racecourse Plantation, it is doubly important that these old buildings and slurry lagoons are tidied away properly; the sensible way of doing this is to incorporate it within development. In fact, it is probably the only area of previously developed land in the vicinity.

FC 10 -Appendix 5-Para 42 Thorpe End has a good service base with a wide range of shops in the village centre and is ideally suited to expand. Whilst the immediate community of Thorpe End might wish to distance itself from any new development ('drawbridge' mentality) this is not always best planning practice. Indeed, the north-western quadrant of Thorpe End was constructed in the 1980s by Bovis Homes but now dovetails neatly in with the settlement. There is no reason why further development and expansion of Thorpe End should not enhance the community and, indeed, make the shops and other services more viable.

'Localism' does not mean what one village wants. Localism requires the involvement of the wider community to establish what is best for the wider community, not just a village-by-village approach. We submit that Para 42 as drafted is unsound, as it cuts out the option for settlement planning in the future.

Statement of Focussed Changes (Joint Core Strategy)

O - 12245 - 8814 - FC10 - None

12245 Object

Focussed changes Appendix 5

FC10

Respondent: Christopher Lawrence Hiscox [8814]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12252 - 1823 - FC10 - None

12252 Object

Focussed changes Appendix 5

FC10

Respondent: Salhouse Parish Council (Mrs D Wyatt) [1823]

Agent: N/A

Full Text:

Summary:

The Council objects to the introduction of the Concept Statement as a revised Appendix to the Joint Core Strategy:

1. To replace a map showing the Growth Triangle with an 18 page wide-ranging concept statement and to then say in the preamble that this is not an opportunity for people to add to their original representations, seems unreasonable.
2. This concept statement contains changes to the Joint Core Strategy which would be challenged, but to require consideration of these changes within this consultation and without appropriate connection to the public renders this virtually impossible.
3. The concept statement represents the introduction of an SPD process at this late juncture covering all the Growth Triangle for the full period of this plan. This is wholly contrary to the stated aim of the Government to 'put the local community in the driving seat- giving real power to local people to control the way in which villages, towns and cities develop'. The introduction of planning through an SPD would be contrary to this objective.
4. The continued reliance on the NDR and the promises on other infrastructure is unrealistic and shows that the concept itself contains significant flaws.

Statement of Focussed Changes (Joint Core Strategy)

O - 12259 - 8047 - FC10 - None

12259 Object

Focussed changes Appendix 5

FC10

Respondent: Wroxham Parish Council (Mrs Daphne Wyatt)
[8047]

Agent: N/A

Full Text:

Summary:

The Council objects to the introduction of the Concept Statement as a revised appendix to the Joint Core Strategy:

1. To replace a map showing the Growth Triangle with an 18 page wide-ranging concept statement and then say in the preamble that this is not an opportunity for people to add to their original representations, seems unreasonable.
2. This concept statement contains changes to the Joint Core Strategy which would be challenged but to require consideration of these within this consultation and without appropriate connection to the public renders this virtually impossible.
3. The concept statement represents the introduction of an SPD process at this late juncture covering all the growth triangle for the full period of this plan. This is wholly contrary to the stated aim of the Government to 'put the local community in the driving seat- giving real power to local people to control the way in which villages, towns and cities develop'. The introduction of planning through an SPD would be contrary to this objective.
4. The continued reliance on the NDR and the promises on other infrastructure show that the concept itself contains significant flaws.

Statement of Focussed Changes (Joint Core Strategy)

O - 12263 - 8821 - FC10 - None

12263 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs Frank & Karen Reding [8821]

Agent: N/A

Full Text:

Summary:

We wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement Please register us as objectors. In our view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in northeast Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. We are concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. We are concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. We object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12266 - 8822 - FC10 - None

12266 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Nicholas Wiltshire [8822]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12269 - 8820 - FC10 - None

12269 Object

Focussed changes Appendix 5

FC10

Respondent: Simon Kett [8820]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10 (FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meeting on the proposals to give the public an opportunity to find out more have been organised.
2. Relabelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12272 - 8823 - FC10 - None

12272 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Greg Insull [8823]

Agent: N/A

Full Text:

Summary:

I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement.

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation'

has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.

2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.

3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the

Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to

have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as

having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.

4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major

traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12285 - 8830 - FC10 - None

12285 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Robert Craggs [8830]

Agent: N/A

Full Text:

Summary:

I respectfully ask for the JCS submission to be withdrawn from review until legislation on local consultation is clarified and we have the Government Spending Review, because:

1. This Joint Core Strategy was a previous Government edict (as admitted at the Exploratory Meeting on 13 May) that pre-empted any credible consultation and in fact makes a sham of on-going consultation.
2. South Norfolk District Council was given the opportunity to opt for a Dispersal Strategy but we were not so a fundamental aspect of consultation was denied us.
3. There has been considerable discussion and debate at various meetings with interested parties including Officer and Member representatives of GNDP who have completely failed to convince people that a) They have listened to sound reasoning. b) Why this inflexible imposed strategy is better than a Dispersal Strategy - the latter has never been discussed or held up for public consultation. c) Why this strategy is considered to be sound by GNDP but unsound by many others as indicated in the analyses of the feedback on the JCS consultation submissions.
4. Consultation participants have already stated reasons for the strategy being unsound in the previous consultations and now we are being asked the same questions in a questionnaire that seems to have been specifically designed to deter people from completing it. Why is it that the objections to the soundness of the plan submitted in the original consultations have not been extracted from the analyses of the findings? We know the answer and that is the same answer to all the points in these submissions, they were disregarded because this strategy is an edict and there is an intention to continue to go ahead with it regardless. Members and Officers have failed miserably to answer questions on the soundness of the strategy in meetings with the public just as they failed at the Inspectors Exploratory Meeting and yet we are being asked to give reasons why we think the focused changes on selected items are unsound. We do not want to stray from our commonsense held views by submitting to a complicated questionnaire that is not designed to be helpful but on the contrary is designed to make it difficult. Why should we go along with this sham consultation that only gives credence to the edict and suggests complying with it us gives it our tacit acceptance?
5. Many people suggested a Dispersal Strategy was more appropriate to Norwich, and to Norfolk so why has this not been presented for public discussion?- because it is an edict is the simple but unacceptable answer. This review should be withdrawn pending a review of the alternatives that people put forward which generally can be summed as a Dispersal Strategy accommodating many of the alternatives and involving much less expenditure such as avoiding the need for the extended Postwick Hub and side roads and the NDR.
6. GNDP misled us by telling us that our views would form the foundation of the strategy; but they did not inform us that it was an edict and one that they would pursue regardless of us or of public expense. They then discarded the views they obtained because the consultation findings were incompatible with the diktat and the majority of participants had rejected the strategy.
7. If I was to attempt to submit objections to the soundness of the strategy which I did originally I would be inclined to add to my early expressed views from what I have learned from others in various meetings to show that I have deeper reservations than ever.
8. I believe that the objections and flaws expressed at the Exploratory Meeting on 13 May were much more profound than what GNDP and BDC officers have reported and minimized and they have chosen to skip other important issues such as flooding potential that is not even mentioned but was raised in consultation. Individual developers may give plausible assurance that they have effective plans to get rid of surface water and prevent flooding by diverting it from their development site but if you examine the consequences of several sites practicing the discharge of water, then a combined effect is inevitable somewhere given the size of these developments; but no one has addressed this fact in terms of soundness.
9. As for objecting on legal grounds, I can only object on moral and ethical grounds because I am not legally conversant with the 2004 Act. However the process of 'community involvement' as described in the GNDP guidance notes, is a legal requirement (where one exists) as the guidance notes pointedly state. Therefore it follows that since the GNDP did involve us in consultation, but binned the findings, they are then in default of their own interpretation of this Act and at least have abused the spirit of the Act.
10. There is the sheer magnitude of publicly stated opposition which the Secretary of State and his Housing Minister must recognize as being very serious in content, volume and public disquiet, and could be disposed to agreeing to the logic and wisdom of requiring suspension of the implementation of this edict of a strategy pending legislative change. I would exhort the Inspector to consider these factors and apply or seek a pragmatic solution to delaying or withdrawing this JCS submission.

Statement of Focussed Changes (Joint Core Strategy)

O - 12299 - 8589 - FC10 - i, ii, iii

12299 Object

Focussed changes Appendix 5

FC10

Respondent: **SNUB (Stop Norwich Urbanisation) (Mr Alan R. Williams) [8589]** Agent: **N/A**

Full Text:

Summary:

Legal Compliance

1. This is not legally compliant because it has not followed the requirements of the Aarhus Convention.
2. This is not legally compliant because the consultation relating to elements of the Growth Triangle is flawed:
 - 2.1 The ECO town was imposed by the Government.
 - 2.2 The responses to consultation were disregarded.
3. The sustainability report will be subject to change after the consultation. It has yet to be considered by the GNDDP. The consultees are not able to comment, as they cannot know the report's content when it is presented to the Inspectors.

Soundness

1. The text indicates the nature of the representation
2. It is not justified because the evidence is not available to show the participation of the local community.
3. It is not effective because there are serious doubts about the delivery of infrastructure.
4. The new government has made a number of changes to policies covering this process, which are not included in this document and therefore it is not possible to say that it is consistent with national policy.

Policy FC 10 Growth Triangle

1. The introduction of the Concept Statement as a revised appendix to the Joint Core Strategy is a device to introduce the Supplementary Planning Document. This consultation answers only some of the questions raised by the Inspectors at the exploratory meeting in May. Rather than providing the strategic justification for the growth, the Greater Norwich Development Partnership have simply declared that it will progress this development through a Supplementary Planning Document. It is also wholly contrary to the stated aim of the Minister who recently said he would 'put the local community in the driving seat- giving real power to local people to control the way in which villages, towns and cities develop'.
2. To replace a map showing the Growth Triangle with an 18-page wide-ranging concept statement and yet say in the preamble that this is not an opportunity for people to add to their original representations seems unreasonable. To understand the scale of this development a map showing the size of the Growth Triangle relative to the whole of Norwich inside the outer Ring Road is attached. (Appendix 1)
3. This concept statement contains some changes to the Joint Core Strategy but in many cases is a re-statement of the ideas in the main text. Why does it need to be repeated? It relies heavily on the work done by the last government through the Department for Communities and Local Government in conjunction with the Town and Country Planning Association. Most of that work dealt with conceptual matters with much generic thinking and little financial appraisal. In that sense it retains its mantle as a Government imposed solution, which has rendered so much of the consultation irrelevant. It seems that even the terminology has been retained. To introduce this as part of a Local Development Framework without any attempt to translate the ideas into practice is not reasonable. As it is written it constitutes a wish list without any substance. It is not appropriate for such a vague series of statements to be used to facilitate the introduction of an SPD process in this way. It fails to meet the obligation that consultation is undertaken in a way and at a time when those consulted can influence the outcome.
4. In the Introduction to this revised appendix, the GNDDP state that not only will this area provide 10,000 houses but it will also include employment, social facilities, waste re-cycling and an extensive green infrastructure.
 - o Councils do not create employment; this will arise in areas where there is a strategic advantage. In the Norwich Planning Area it is clear that the Growth Triangle is in the wrong place to achieve this.
 - o Waste re-cycling is stated as a facility to be located in this area but it was not contained in the Draft Waste Management Plan issued by Norfolk Council. Neither the nature nor extent of such a development been described by the GNDDP throughout this process.
 - o The extensive green infrastructure is being massively eroded by this development. The building of so many houses on productive farmland also has an impact on future sustainability.
 - o The Council's record in providing special, distinct and exciting places to live and work is not good.
5. The intention of the whole of the Joint Core Strategy hinges on the rationale for more housing at paragraph 5.
 - o So why does this change only apply to the Growth triangle?
 - o "The Government supported the development of the ECO Town in the Supplement to PPS 1 in 2009". However, that Government has now gone and the present Minister has stated that 'I want to see eco development and zero carbon homes at all levels - the home, the street, the village and across the country not just in a small number of selected ECO towns.'
 - o A proposed consultation on site-allocations to meet the needs of the 5-year housing supply was abandoned by Broadland in June this year. There is concern that the consultation was delayed until after the Joint Core Strategy was approved because it would further highlight the full scale of the plans.
 - o The headlining of the ratio of house prices to income is interesting because there are many reasons why this should be and they are not only related to the number of dwellings. This area is attractive to people who retire from other more

Statement of Focussed Changes (Joint Core Strategy)

O - 12299 - 8589 - FC10 - i, ii, iii

12299 Object

Focussed changes Appendix 5

FC10

affluent parts of the Country. The low level of earnings is a major factor but is itself distorted as it includes the income of so many retired people.

o The building of large housing estates in Norwich has been tried before; both public and private, though never one this big. The potential demand in such unique surroundings is huge and yet more development is not sustainable.

Distribution of development across the County, as partially evidenced in the approach of South Norfolk Council should not have been dismissed.

6. A key weakness of Rackheath remains the lack of any distinctive competitive advantage to offset its disadvantages as a business location. The Focused changes seeks to establish this through links to other areas and its eco-credentials, but fails to produce any convincing evidence in support of its assertions. The Economic Development Strategy provides no credible basis to support the claim of being able to create over 4,000 new jobs. Employment is one of the most challenging issues associated with Eco-Towns, and this cannot be considered as a sustainable location.

More than just the number of jobs, the quality of these jobs should be of concern. The focus on light and general industry on these existing industrial estates makes this just more of the same. It provides little prospect for raising average local earnings and will be in direct competition for limited investment funds.

7. We are fully supportive of the aspiration to minimise energy demands. The concept statement notes that there are constraints on utilities that affect the proposals for the Growth but these are not easy to understand. There appears to be some confusion caused by the statements in this consultation. It was said that there was an ample supply of electricity and that renewable energy potential was over 160% of the current energy consumption. There was no attempt to quantify that. Now we see that there are deficiencies in the supply network and the national grid will require upgrading. Proposals for alternative means of power generation are not clearly expressed and are still not sufficiently developed to justify the claims previously made.

8. The issue of water supply is well known. The policy observes that there are no specific water supply issues relating to the Growth Triangle, though even this is qualified by a requirement for local network reinforcement. The general shortfall in water supplies to the East of England and consequent pressure on resources is, however well documented by the EA and the water companies.

9. The omission of the health service from the constraints is surprising.

10. In highlighting the shared infrastructure and sustainability, the GNDP is dealing with issues where there are conflicts between the constituent partners. Amongst other things, it includes a statement that it may include a High School at Rackheath. This is to be provided by 2026. It appears that the plans contain provision for improvements to these facilities but questions arise about delivery. There is already a need in Rackheath for additional Primary school places but even this cannot be fulfilled. The Parish Council is clear that it should be provided before the LPA approves more house building.

The provision of high quality communications has already been sought throughout the County but providers do not find it commercially attractive and there is no evidence that it will be forthcoming.

This applies equally to high quality transport services. It does not seem that this will be achievable under the present system without subsidy. It would also require priority access along routes that are not going to be upgraded and are in some cases scarcely wider than the minimum specification. Establishing priority lanes will be at the expense of many other users whose destinations are not conveniently served by public transport.

The tram-train concept is flawed because unlike continental services, trains require a raised platform and this is inconsistent with street level embarkation. If this had been a serious proposal they could have first been introduced on abandoned rail lines in and out of Norwich but there is no evidence that any such scheme is supported.

11. The reliance on the NDR must continue to be questioned. This is a development road and programme entry status was awarded by the former Government. The County Council has been warned about continued spending on this road. In addition the Postwick Hub described in the plan, is to be called in by the Secretary of State who says there are subjects of such significant public importance that they should be debated publicly at a local inquiry. That this road is intended to serve the development can be found in the employment assumptions. There are already empty units in Rackheath that and of the other locations only one does not require the use of this road.

Traffic models, which suggest that there will be no increase in traffic as a consequence of building 10,000 houses, are not plausible.

12. The promises on other infrastructure show that the concept itself contains significant flaws. Community engagement has not been a strong suite of Broadland District Council who are responsible for this part of the Norwich Planning Area. Their ECO Town Programme Board which passed on information to representatives of the Local Community had no feedback process and no way to be influenced by any other view than that of the District Council. At this late stage it is proposed to change the make up of the membership but new terms of reference still lack any community voice.

This has an impact upon the response of the present community to the issue of Governance where the rhetoric and reality seem to diverge.

It also raises questions about the final part of the Concept Statement.

13. This is an entirely LPA led process which is unnecessary and undesirable.

An Area Action Plan (AAP) is a development plan document focused upon a specific location or an area subject to conservation or significant change. This includes a major regeneration project or a growth area. This is a growth area. An AAP is also subject to independent examination. This should be the preferred method.

When adopted, SPDs form part of the Local Development Framework but do not have development plan status, are not necessarily covered by a Sustainability Appraisal and are not subject to independent examination. The community

Statement of Focussed Changes (Joint Core Strategy)

O - 12299 - 8589 - FC10 - i, ii, iii

12299 Object

Focussed changes Appendix 5

FC10

involvement plans in the Concept Statement are welcomed but have no meaningful value under an SPD.

14. Masterplanning sounds and is an autocratic procedure. It is to be led by the development promoters. This is not a desirable way of proceeding. If the Council is speaking for the developers, who is speaking for the community. This is a good reason why the SPD route for development should not be approved. It is unsound, undemocratic and unjustifiable.

Statement of Focussed Changes (Joint Core Strategy)

O - 12302 - 8835 - FC10 - None

12302 Object

Focussed changes Appendix 5

FC10

Respondent: Wroxham Parish Plan Group (R B Colman) [8835] **Agent:** N/A

Full Text:

Summary:

I write on behalf of the Wroxham Parish Plan Group. The Group was formed under the auspices of the Wroxham Parish Council in line with the Government initiative to encourage village communities to have their say on matters affecting the village. As usual in the initiative the opinion of each household on a wide range of issues was gleaned by means of a questionnaire. We undertook the questionnaire survey in the spring of this year. We have a response from 443 households out of a total of 654 primary residences (second homes and holiday lets being discounted). This response reflects a 68% return, compared with 65% in the recent general election. We therefore consider that we have a mandate to speak for the whole Village.

The answers to a number of questions relevant to your enquiry were:

Q39 Wroxham is designated as a Key Service Centre in the proposed Joint Core Strategy for Greater Norwich. It is proposed that it is therefore suitable to receive 200-300 new dwellings between now and 2026. Is Wroxham well placed to cope with this development?

Yes 49 No 343

Q40 is the existing village infra-structure able to support the development of 200-300 extra houses

Yes 35 No 352

Q41 Does anyone in your household need their own housing in Wroxham?

Yes 35 No 381

Q43 Do you know anyone who has had to move away from Wroxham because they could not find housing locally that they could afford?

Yes 57 No 330

Q46 Are you in agreement with the intended Eco town in Rackheath?

Yes 80 No 304

Q47 Are you in agreement with the proposed conference and tourist development in Salhouse?

Yes 79 No 225

We urge you to take the views of a community such as ours into account in your deliberations.

Statement of Focussed Changes (Joint Core Strategy)

O - 12310 - 8837 - FC10 - None

12310 Object

Focussed changes Appendix 5

FC10

Respondent: L Stavridis [8837]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector and acknowledge receipt of this latter. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12313 - 8838 - FC10 - None

12313 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Jason Michael Hollidge [8838]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12314 - 7782 - FC10 - None

12314 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Stephen Streeter [7782]

Agent: N/A

Full Text:

Summary:

Wether or not, and as is usual, in these so called democratic planning meetings, if things are not already signed and sealed, my wife and i strongly object to anybody even considering the wanton destruction of Thorpe/Sproston woodlands. The woods, plantations, and green field sites, in our area are well loved by the majority, and we care deeply for not only the tree's, plants, etc but also the vast amount of wildlife. If you want more concrete and bricks etc, build them where you live, and for once in your lives, do what the democratic majority want,.....and that's, leave well alone.

Statement of Focussed Changes (Joint Core Strategy)

O - 12317 - 8840 - FC10 - None

12317 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs Sue and Graham Bergin [8840]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

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Respondent: Thorpe and Felthorpe Trust [6993]

Agent: Savills (London) (Miss Sarah Beuden) [8612]

Full Text:

Summary:

The Old Catton, Sprowston, Rackheath, Thorpe St Andrew Growth Triangle - Strategic Allocation Concept Statement

Introduction
Paragraph 1

The Thorpe and Felthorpe Trust (TFT) support the identification and allocation of the location, shown on map 1, for a major urban extension for at least 10,000 dwellings.

The land promoted by the TFT is shown in appendix 1 and is expected to form a significant part of one of the 'quarters' for growth within the triangle. This land has previously been promoted as part of a much larger urban extension by the nascent Broadland Land Trust (BLT) which has been looking at effective means by which to promote the constituent land holdings collectively. The grouping has produced a number of collective representations and commissioned a scoping exercise for an Enquiry by Design (EbD) collectively. However, due to the complexity of formulating collective promotion arrangements, and the changing planning and financial context, for the purposes of this consultation, the respective landowners are promoting their land holdings separately in advance of a legally formalised consortium or partnership arrangement.

The TFT has advocated the adoption of the principles of 'smart growth' in developing the overarching framework for the NE Growth Triangle and beyond. This proposition replaces a housing led narrative, proposing that growth should aim to support sustainable economic principles, and improved quality of life alongside an increase in the housing supply. Inherent in the proposition is the requirement to look for a growth model that drives efficiencies, in land use, infrastructure and through reducing the need to travel by the creation of a less car dependent urban footprint.

The TFT support the concept of sustainable urbanism and walkable neighbourhoods, which proposes that new development and infrastructure should be planned to ensure that neighbourhoods have appropriate facilities and services to cater for their daily needs without resorting to car use. This promotes a more sustainable urban footprint and enables a modal shift in favour of walking, cycling and public transport. Existing and new neighbourhoods are linked together service centres, employment and leisure opportunities, which are distributed within 5-10 minute walkable 'ped-sheds'¹ to significantly reduce the need to use the private car to service daily needs. Equally, densities along key routes need to be carefully considered to support viable and frequent public transport.

The TFT acknowledges the need for new transport infrastructure to support the growth of the city and county. The land being promoted by the TFT has the locational advantage of benefiting from existing transport networks which should be capitalised upon. Equally, the scheme could operate as the catalyst for further incremental improvements to the local transport network.

The Norwich Area Transport Strategy (NATS) proposes a number of improvements to public transport services, such as Bus Rapid Transport (BRT) services and one of the proposed BRT corridors is intended to serve this area. These services will provide quick and convenient links between Norwich City Centre and the north east sector. This location also benefits from having convenient access to the existing bus and park and ride services that are located at Wroxham Road.

¹ Ped shed is short for pedestrian shed, which is the area encompassed by the walking distance from a town or neighbourhood centre, often defined as the area covered by a 5-minute walk (about 0.25 miles or 400 meters).

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A route for an inner link road has been safeguarded in part within Broadland District Council's existing Local Plan. This link road is safeguarded in two parts, one of which has an extant planning permission. However, it should be noted that the road as currently safeguarded, does not link through. The 'missing section' is located within the area of land being promoted by the TFT. The provision of a more substantial complete link road in this location could enable the delivery of the urban extension in advance of the Northern Distributor Road (NDR). It will act to support north/south traffic, cycle and pedestrian movements around the periphery of Norwich and within the fabric of the new development promoted by the TFT. It will encourage orbital movements between the Broadland Business to the south and Wroxham Road to the north, thus relieving pressure on existing arterial routes. It would also create easier access to the park and ride facility on the Wroxham Road, potentially encouraging more people to use this facility and in turn, reducing commuter traffic into the city.

It is acknowledged that the proposed NDR would act to relieve pressure on arterial routes into and across the City; create better access to the airport and provide more direct links to the regional and national road network. However, even in the absence of the NDR, the TFT still

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consider that North East Norwich is the most sustainable location for growth. It is considered that levels of growth, as promoted by the TFT (and BLG), can be delivered without the NDR through the provision of the link road. The TFT feel that the Joint Core Strategy makes a distinction between growth quarters within the triangle, such as, in our opinion, the land proposed by the TFT, can come forward without the NDR..

It is also felt that the land promoted by the TFT could benefit from a new tram/train that could be implemented on the Bittern Line to provide significant public transport improvements. The TFT would welcome the opportunity to explore this with the GNDR, Broadland District Council and other relevant stakeholders.

The TFT accept that the policy requires that a co-ordinated approach to the development of the area be adopted and consider that this should be further developed through the development of an infrastructure and strategic framework as set out in paragraphs 49-53 of the focused changes. The TFT would expect to be a key stakeholder in the development of this document.

Paragraph 2

The TFT support this statement. The masterplan that is being developed by the TFT is based on the concept of 'walkable neighbourhoods'. This includes ensuring that community and commercial uses are integrated within the urban structure so that the daily needs of residents, in terms of services and facilities, are easily accessible by foot and other sustainable means of transport. Neighbourhoods within the new urban extension will connect with one another. Each will contain an appropriate density to support local services and facilities needed on a daily basis, which should be within a 5 -10 minute walk of most residences. The masterplan will also take into account existing local services within established neighbourhoods on the fringe of Norwich and consider how the location and composition of proposed neighbourhood centres can provide supplementary and accessible amenities to established communities. It is considered that new growth should also be designed to integrate with existing city fringe neighbourhoods to provide connectivity with new amenities and communities. It is considered that the land being promoted by the TFT comprises the natural location for the urban area to grow organically and sustainably, rather than by creating isolated, relatively remote communities that encourage unsustainable patterns of development lacking connectivity and critical mass. In addition, in building on its natural characteristics, it will be designed to have distinct character and sense of place, enhancing the quality of life of existing as well as new communities.

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Concept of development

Existing assets

Paragraph 4

The TFT support this statement. The concept of sustainable urbanism includes creating communities with a local character and 'sense of place' that people can feel a connection to. The area being promoted as a sustainable urban extension by the TFT is fortunate in having a number of attractive landscape features and good links to areas of landscape and recreational interest, such as the Norfolk Coast and the Broads.

The TFT considers that it is important to conserve, manage and enhance of the natural and built environment, which are of value to the local area and beyond. Ecological, landscape and heritage assessments will be carried out during the masterplanning process to ensure that important features are maintained and, where possible, enhanced. It is the intention that such features are integrated into development in order to create a sense of place and a quality environment in which to live, work and visit. This allows new and existing communities to benefit from its environmental and amenity value and to access it as a recreational resource. This will result in more sustainable growth whereby communities have appreciation and respect for the natural landscape as well as improved opportunities for interaction with the natural environment. The natural landscape is also crucial to creating high a quality environment, which in turn attracts people and builds value in the area.

The value of identified assets will be analysed in more detail as the masterplanning and development is brought forward. The County Wildlife Site designation on the plantations is not an impediment to development. Indeed without development, the heathland restoration aspiration of the two authorities simply can not be achieved in the context of a plantation and woodland crop. Equally, the opportunity of development will enable an enhancement of the woodland which can be managed to prioritise amenity rather than commercial purposes. The landscape should not be seen as static, and the overall strategic framework should identify opportunities for the creation of new landscape, habitat, recreational and productive features. It should also be noted that the Strategic Housing Land Availability Assessment Matrix is a static and blunt tool that only takes account of existing designations and characteristics of sites. It does not take into account the potential contribution that sites can make and the benefits they can achieve in terms of sustainable growth. Nor does it take into account the complexity and timeframe involved in bringing together neighbouring sites, which together can create a coordinated and more sustainable approach to growth.

Landscape

Paragraph 5.

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It will be important, in developing a landscape framework for the new growth areas, to recognise a fundamental shift in the character of the area, from urban fringe towards a transformation into an integral set of neighbourhoods within the fabric of the city. While the preservation and enhancement of natural features will be key to establishing a high quality environment and its conservation is important in its own right, such features must respond to a changing role in landscape, environmental, recreation, productive and leisure conditions within the geography of the city.

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Biodiversity

Paragraph 6

The land being promoted for the urban extension by the TFT includes the Racecourse, Belmore and Brown's plantations, which are designated by Broadland District Council as Areas of Important Landscape Quality and County Wildlife Sites. However, in reality, both the landscape and ecological quality of these sites varies significantly with none being worthy of any higher designation. Within the combined sites are numerous other landscape features that contribute to the character and the landscape quality of the setting and each of these will be considered on its merits.

The new urban extension provides an opportunity to assess the quality of the landscape and retain and enhance the most valuable parts, which will form an integral part of the planned new neighbourhood in providing a valuable amenity for existing and new residents and, in parts, an attractive setting for sympathetic development. It also provides a financial mechanism to manage the land sustainably for amenity and public access. Equally, the wider strategic framework provides an opportunity to create new landscape, environmental, productive and recreational features as part of an area-wide approach which recognises the changing context and function of the area as it grows and develops.

Settlements

Paragraph 8

TFT are planning growth in a way that will help to build new communities and integrate them with existing ones, sustaining and creating distinct identities of each. The concept of sustainable urbanism includes a mix of uses, services and facilities that are appropriately situated to generate a level of self-containment in order to provide people with the opportunity to interact with one another. Through the masterplanning process, the location of such facilities will be established in order to optimise the opportunity to provide additional amenities for existing communities, while providing viable centres to new neighbourhoods.

Employment

Paragraph 9.

The land being promoted by the TFT benefits from the presence of the established Broadland Business Park and St Andrew's Business Park. These represent a significant concentration of employment within this part of Norwich, jointly comprising over 88,000 sq.m of employment floorspace and employing over 4,000 people. This is in addition to the Rackheath Industrial Estate, which comprises 66,000 sq.m of employment floorspace. The presence of these employment locations provide easy and convenient access to job opportunities to serve existing and new communities in north east Norwich and the county more widely. In planning for growth, a key consideration will be to establish sustainable travel patterns between residential areas and business/industrial parks in addition to the City Centre and beyond. It should be considered how the new urban extension will help to support the economic proposition offered by the presence of the business parks, providing a complimentary, high quality residential and lifestyle proposition to help to promote inward investment and secure economic growth.

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Movement including NDR:

Paragraph 10.

As highlighted above, the land promoted by the TFT will encourage the use of more sustainable modes of transport, prioritising walking, cycling and public transport in that order. This includes providing a choice of permeable routes through the area and co-locating services and facilities appropriately to reduce the number and length of car journeys needed to be undertaken per household. In addition, it is the intention that the urban form of the urban extension is robust and adaptable to changing occupational requirements over time, to accommodate technological advancements and/or movement towards the live/work lifestyle, which can act to reduce the need for people to commute.

The Norwich Area Transport Strategy (NATS) proposes a number of improvements to public transport services, such as bus rapid transport services. These services will provide quick and convenient links between Norwich City Centre and the north east sector. This area also benefits from having convenient access to the existing bus and park and ride services that are located at Wroxham Road.

In addition, growth in this location offers the opportunity to make better use of the existing but underused Bittern Railway Line. Land is currently set aside for a rail halt within Broadland Business Park. The relocation of this, or the creation of an additional rail halt will link residential areas with employment, giving people greater access to jobs and thus improving

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the viability of commercial activity in this location. The TFT agrees with the Inspector's recommendations that the potential for tram/train transit opportunities should be fully explored and would welcome the opportunity to explore this with the GNDP, Broadland District Council and other relevant stakeholders.

As set out above, the provision of a complete link road in this location will enable the delivery of the urban extension in advance of the NDR should this not proceed. It will act to support north/south traffic, cycle and pedestrian movements around the periphery of Norwich and within the fabric of the new extension and encourage orbital movements between the Broadland Business Park to the south and Wroxham Road to the north, thus relieving pressure on existing arterial routes. It would also create easier access to the park and ride facility on the Wroxham Road, potentially encouraging more people to use this facility and in turn, reducing commuter traffic into the city.

It is considered that levels of growth, as promoted by the TFT, can be delivered without the NDR through the provision of the link road. As stated above, the TFT feel that the GNDP should, therefore, make the distinction in the Joint Core Strategy, between growth quarters within the triangle, such as the land proposed by the TFT, that that can come forward without the NDR and those areas that cannot. In not doing so, it is considered that the soundness of the JCS is threatened.

It is important that land use and densities are considered as part of a sustainable transport approach, such that main routes within the growth triangle are conceived to support the viability of public transport through an appropriate disposition of uses and densities. Equally, it should be acknowledged that the delivery of walkable neighbourhoods (refer to responses to paragraphs 1, 2 and 36 above) should in themselves help to reduce congestion and car use through enabling daily needs to be serviced by other more sustainable modes. It is considered that this is explored through the Supplementary Planning Document

Existing constraints

Airport public safety zone:

Paragraph 11.

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The land promoted by the TFT is not affected by the airport public safety zone.

Airport noise contours:

Paragraph 12.

The land promoted by the TFT is not affected by the airport noise contours.

Utility constraints:

Paragraph 13.

The TFT recognise that development within the growth triangle will have to be co-ordinated to ensure that the appropriate infrastructure is provided viably, and at the right time. However, it is considered that the issues highlighted above do not present any unusual or unexpected constraints associated with an area of significant growth. Such utility constraints are not insurmountable but will require coordination between each development 'quarter'. This does not preclude an incremental approach where infrastructure is phased to unlock successive waves of development.

Development Proposals

Vision/ objectives

Vision

The TFT broadly support the vision for the growth triangle but consider that the following changes should be made:

The Growth Triangle will have developed into a special, distinct and exciting place through the delivery of 7,000 new homes by 2026 and continuing to grow to at least 10,000 new homes thereafter. Alongside housing, employment opportunities, services, facilities and key infrastructure will have been delivered across three or four main development centres.

Development within the Growth Triangle will grow out of and reflect existing places and communities. Important landscape and heritage assets will have been preserved and enhanced in the context of their changing role within the fabric of the city. A multi-functional network of greenspaces and green links connecting to Norwich and the rural hinterland will have been provided. This green network will support the recreational and leisure needs of the population whilst also supporting the conservation and enhancement of local wildlife, food security and local food links and production.

and:

Physical linkages between the older villages of the Growth Triangle and suburbs of its hinterland will have been created to support community integration and equity in access to services and facilities. Within the Growth Triangle employment growth will have been achieved, including within green industries and knowledge economy, building upon the ecocredential and economic attraction created by the development of the Growth Triangle. In addition, first rate connections will have been provided to the key employment locations of Broadland Business Park, the Airport Industrial Estate and Norwich City. These connections will provide for a range of transport choice, which will include walking, cycling and public transport.

Objectives

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The TFT broadly support the objectives for the growth triangle but consider that the following changes should be made:

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Housing

- * To sustainably deliver 7,000 new homes by 2026, rising to at least 10,000 thereafter.
- * Secure a range of housing tenures and types, including sufficient levels of affordable housing, to ensure that all levels of housing need are met and different life-stages can be accommodated within the context of a balanced community. This will be based on detailed quantitative and qualitative analysis both of need and market conditions.
- * To for those in need, ensure that affordable housing is tenure blind and of the right type and size to meet demand based on detailed quantitative and qualitative analysis.

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Economic Development

- * To identify suitable areas for employment land as part of an increasingly mixed use development proposition.
- * Create links to the key strategic employment sites in the hinterland of the Growth Triangle and in Norwich.
- * Stimulate employment growth within the Growth Triangle of a range and type that will give people a choice about where they can seek employment.
- * Create an environment that will stimulate new business growth and expansion, diversifying local business creation, employment and self employment opportunities.
- * Provide an environment that will be locationally and economically attractive to inward investment, building upon the eco-credentials and quality of life that the area offers of the area.
- * Build on the attractiveness of Norwich generally as a centre of the knowledge economy and financial services.
- * Create intellectual capital, business creation and training opportunities through pioneering the eco-excellence of the growth triangle

Environment

- * Protect and enhance the quality and distinctiveness of biodiversity, geo-diversity and landscape value within the Growth Triangle.
- * Create a multi-functional network of green spaces and links which provide connections for people and wildlife to Urban and Rural hinterlands of the Growth Triangle and a range of leisure/well-being, educational and productive opportunities.
- * Ensure that new buildings and places achieve high standards of environmental sustainability.
- * Secure opportunities for local food and fuel supply, and reinforce local supply chains.

Principles

Paragraph 16.

In May 2009, an Enquiry by Design (EbD) process was initiated by the nascent BLT (of which the TFT is a part) championed by the Princes Foundation for the Built Environment (PFBE) which began to identify the key and detailed issues associated with growth in this location through scoping workshops. In terms of design, through experience in undertaking a large number of EbDs across the UK, the PFBE have identified a range of issues that generally need to be taken into account in terms of integrating existing and new communities. These include:

- * Ensuring that existing and new communities are linked by a network of permeable walking and cycling routes to encourage social interaction;
- * Locating services and facilities in appropriate locations so that they are easily accessible by both existing and new communities and become a focus for social activity and interaction;

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- * Providing places and buildings where people can meet and interact, which are to be appropriately distributed through a walkable land use plan;
- * Designing development to respect and enhance local context and character;
- * Through design, creating a sense of place to ensure that both new and existing communities are able to connect and have a strong identity with the place in which they live; and
- * Involving existing residents and stakeholders in the planning and design of new communities.

The TFT also support the concept and principles of 'Smart Growth' set out above, seeking a sustainable regional geography which looks for opportunities to produce development that is:

- * Land use efficient
- * Infrastructure efficient
- * Location efficient (i.e. produces walkable neighbourhoods and viable public transport)
- * And which looks for an economic multiplier in development, supporting economic and well as housing growth.

A smart growth approach will produce a more economically sustainable growth proposition through seeking to utilise and add to embedded investment in existing infrastructure to

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support new communities, which is substantially more cost efficient than building it in isolation. The concept and principles of smart growth compliment those of sustainable urbanism and walkable neighbourhoods and encourage the development of distinctive and attractive communities in a sustainable, cost effective and resource efficient way. Within the context of North East Norwich, a development plan that is founded on the principles of smart growth should:

- * Inherently reduce car dependency and commuting and therefore contribute to reduction in congestion aspired to the Norwich Area Transport Strategy (NATS)
- * Support the economic growth and prosperity of Broadland, Norwich and Norfolk.
- * Utilise our limited land resource efficiently
- * Utilise historic investment in infrastructure efficiently, and manage the need for new infrastructure to an economically sustainable plan
- * Improve quality of life and well-being
- * Produce sustainable, cohesive neighbourhoods to accommodate a growing and changing population.

To this end, and in the spirit of the Government's new localism agenda, the TFT recently undertook a Charette with Duany Plater-Zyberk & Company (DPZ) inviting local stakeholders to consider how development on the land promoted by the TFT can be configured to build upon the existing infrastructure and natural assets of the sites to create a framework for growth that builds and enhances the character and quality of the NE fringe of the city. Consideration was given to other quality neighbourhoods within the city and county, learning from the configuration and patterns of traditional urbanism that are germane to Norwich and Broadland. The character of the natural landscape was also be considered in detail to establish how the fine rural setting of the sites can be reinforced and developed to provide a range of landscape, leisure and productive assets as well as a high quality setting for development. Importantly the connections and interface between the existing communities and the proposed development will be considered with care.

The outcome of the Charette will form the basis of a masterplan for the development of the TFT land. An indicative masterplan will be available in time for the Examination in Public on the Joint Core Strategy.

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Whilst recognising that detailed proposals cannot come forward in advance of the JCS, the TFT considered it important to begin to test the overarching principles set out in this document and elsewhere within the context of a specific site. The exercise has helped to clarify areas of strategic and infrastructure planning that need to be interrogated within the context of a strategic framework in order to inform site specific masterplans, and our findings are embedded in this representation. Equally, the exercise has helped to inform considerations of capacity, viability and phasing and have strengthened the justification that this is the most appropriate and sustainable location for growth.

The charette process has been cited as a potential mechanism for engaging communities within the context of the Government's localism agenda. The exercise undertaken by the TFT at this early stage highlights the need for, and the challenges inherent in facilitating a new basis of dialogue between respective stakeholders; the tension in reconciling site specific and strategic issues and objectives; and the need to develop a mature dialogue between the respective stakeholders across the range of issues pertaining to a site.

Distinct quarters

Paragraph 17

The TFT support this statement and consider that the land promoted by the TFT will form a distinct but significant part of a separate quarter of the growth triangle.

Landscape structure

Paragraphs 18 - 21.

The TFT recognise that natural landscape features that have the potential to make a valuable contribution towards creating a high quality environment and to provide space for public amenity, production and recreation. Valuable features should indeed be enhanced and there is an opportunity, within the context of an overall landscape framework, to create new landscape features which will constitute a landscape heritage for future generations reflecting the dynamic nature of the landscape, and the changing context of the sites as Norwich and Broadland grow.

The land being promoted for the urban extension by the TFT includes the Racecourse, Belmore and Brown's plantations, which are designated by Broadland District Council as Areas of Important Landscape Quality and County Wildlife Sites. However, in reality both the landscape and ecological quality of these sites varies significantly. Within the combined sites are numerous other landscape features that contribute to the character and the landscape quality of the setting and each of these will be considered on its merits. Assessing potential development in the growth triangle provides the opportunity to assess the quality of the landscape to conserve and enhance the most valuable parts, which will form an integral part of the new communities in providing a valuable amenity for residents, and to create new landscape features.

Detailed assessments are required to assess which parts of the land proposed are of

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landscape and/or ecological value and therefore merit protection. A future approach to management of the sites could oversee the enhancement and proliferation of mature broadleaf woodland managed to prioritise amenity and biodiversity objectives, the creation of green links and corridors throughout the wider development and the creation of linked natural water features, which not only are an attractive part of the landscape but can also be utilised as part of a sustainable urban drainage system.

Other more structured landscape features, such as new parks, communal gardens, open sports facilities, 'village' greens, allotments and private gardens must also be considered as vital parts of the landscape. Such measures have already begun to be considered through the initial masterplanning process. Indeed the TFT have started to undertake detailed ecological

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and landscape assessments, to ensure that important features and valued assets are maintained and enhanced.

In developing a landscape 'character' for the new growth area it will be important to recognise the shift in the character of the area, from rural/urban fringe towards its transformation into an integral set of neighbourhoods within the fabric of the city. In masterplanning terms it is important that the green 'infrastructure' of the growth area is also recognised for its ability to add value as a desirable setting for development and engender a 'sense of place'. This could become a key characteristic of the wider scheme, providing a distinct lifestyle offering based on the creation of walkable neighbourhoods within a managed parkland/woodland setting, offering a range of sustainable lifestyle and recreational choices.

Accessibility to quality open space also promotes health and well being and can provide educational opportunities. It is the intention that the new urban extension promoted by the TFT integrates a variety of functional and usable open spaces to cater for existing and new communities as well as making the most of the landscape assets that exist in and around the area. This will contribute towards creating a high quality environment and a sense of place.

The economic sustainability of green infrastructure should be as closely interrogated as other aspects of the development and a realistic approach both to the capital and revenue aspects of the landscape framework should be a key consideration.

The TFT, therefore, consider that the following amendments are made to the JCS:

The landscape character assessment emphasizes the need to protect, manage and enhance historic parkland and the setting of churches, halls and manor houses as well as maintaining the distinction between existing settlements and the main urban area of Norwich while recognising the new context of the sites within the growth area. It is important that these objectives are incorporated with the appropriate protection and where appropriate enhancement of the existing important assets including trees, copses and woodland, particularly Ancient Woodland, historic parkland and gardens, and County Wildlife Sites, together with the restoration of hedgerows and maintenance of the structure of hedgerow belts. It is acknowledged that the value of such assets varies throughout the area and therefore, detailed landscape assessments will be required when assessing potential development in order that valued assets are protected. The connectivity offered by hedgerows is an important factor emphasized by the green infrastructure work already undertaken, and should be reinforced. This will need to include links to existing assets to create "stepping stones" linking those within the urban area to the urban fringe, and the appropriate disposition of both informal and formal open space serving a variety of landscape, environmental, and recreational objectives. The opportunity to create new landscape features to structure and support the new developments within the area, and to create a future landscape heritage should also be considered. As with other aspects of the strategy, economic sustainability should be a key consideration in planning the green infrastructure. Shared infrastructure/ sustainability criteria including code levels, district heating/local energy generation

Paragraph 23.

The TFT recognise that there is a need for a co-ordinated programme of infrastructure to support the development of the growth triangle. Whilst it is acknowledged that social infrastructure is required in order to ensure sustainable growth and to support both new and existing communities, the TFT support the GNDP in the view that certain elements will be delivered in later in the plan period when they can be supported by a critical mass created by the new communities that will emerge through development. The TFT recognise that there will ultimately be a need for a new secondary school within the growth triangle and will work with the authority and other landowners to identify and facilitate the most appropriate site to accommodate this at the appropriate threshold.

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Paragraph 24.

The TFT consider that the phasing of development will be an important consideration in the determination of the most appropriate and viable mechanisms of energy generation to be employed in the growth area and support the GNDP's statement that this will have to be part of detailed local assessment. The TFT expect that the detailed phasing of development will be explored through the development of a strategic framework in the form of an SPD, as set out in paragraphs 49-53 of the statement of focussed changes.

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The TFT object to the statement that it is expected that buildings in the area will be expected to comply as a minimum with the requirements of the eco towns policy statement. It is considered that this requirement should only apply to Rackheath, which has been identified as a eco-town within the relevant national policy statement. To apply this standard to the entire growth area is onerous and is not justified. As such, this statement should be removed.

Paragraph 25.

In accordance with the concept of sustainable urbanism, it is envisaged that the urban extension promoted by the TFT will accommodate technological advancements and movement towards the live/work lifestyle, which can act to reduce the need for people to commute and enable greater job and lifestyle choices.

Paragraph 26.

The TFT support the statement that attention should also be given to the need to improve orbital connections within the areas, other than the Northern Distributor Road and that the previous local plan promoted an orbital link between the Sprowton fringe and Broadland Business Park and retention or extension of this corridor, with emphasis on the promotion of non car travel should be given full consideration.

This refers to the inner link road, which has been safeguarded in part within Broadland District Council's existing Local Plan. This link road is safeguarded in two parts, one of which has an extant planning permission. However, it should be noted that the road as currently safeguarded, does not link. The 'missing section' is located within the area of land being promoted by the TFT. The provision of a more complete link road in this location will enable the delivery of the urban extension in advance of the Northern Distributor Road (NDR). It will act to support north/south traffic, cycle and pedestrian movements around the periphery of Norwich and within the fabric of the new development promoted by the TFT. It will encourage orbital movements between the Broadland Business to the south and Wroxham Road to the north, thus relieving pressure on existing arterial routes. It would also create easier access to the park and ride facility on the Wroxham Road, potentially encouraging more people to use this facility and in turn, reducing commuter traffic into the city.

Please also refer to responses to paragraphs 1, 9, 10 and 16 above.

Paragraph 27.

The TFT supports the bus rapid transport (BRT) services and one of the proposed BRT corridors is intended to serve this area. These services will provide quick and convenient links between Norwich City Centre and the north east sector.

Paragraph 28.

The TFT consider that growth in the north east sector of Norwich offers the best opportunity to utilise the existing capacity on the underused Bittern Line (the Norwich-Sheringham railway line). Land is currently set aside for a rail halt within Broadland Business Park. The relocation of this or the creation of an additional rail halt within a new urban extension in north east

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Norwich, linking with the proposed Eco settlement at Rackheath, would create a new rail transit and public transport interchange, linked to the centre of Norwich and the wider national rail network. This would act to increase transport choice and promote more sustainable modes of transport. It would also increase connectivity to and from existing communities and support future communities, giving people better access to jobs and improving the viability of commercial activity in this location. In accordance with the Inspector's comments, the TFT consider that the potential for tram/train transit opportunities should be fully explored.

Mixture of uses/district and local centres

Paragraph 32.

The TFT support this statement. The concept of sustainable urbanism includes a mix of uses, services and facilities that are appropriately situated in order to provide people with the opportunity to interact with one another. The new urban extension being promoted by the TFT will be designed to create healthy and sustainable communities by co-locating a mix of uses that are easily accessible to existing communities and provide a range of services, facilities and employment opportunities to serve the community's day-to day needs thus reducing the need to travel.

The new urban extension will also integrate a range of recreational opportunities and community facilities that promote health and well-being. In addition, it is anticipated that the new urban extension will be designed to integrate and be sympathetic to the existing urban fabric whilst ensuring that new communities have a distinct character and sense of place. Through the masterplanning process, the TFT have already started to examine where location of such facilities will be established in order to optimise the opportunity to provide additional amenities for existing communities, while providing viable centres to new communities. The provision of these local services inherently creates local jobs and business opportunities which may be serviced by a resident population.

Community infrastructure/social/faith/open-space including open space assumptions

Paragraph 33.

The TFT accept that the policy requires that a co-ordinated approach to the development of the area be adopted and consider that this will be further developed through the a strategic area framework approach, in the form of a Supplementary Planning Document, as reflected in

Statement of Focussed Changes (Joint Core Strategy)

O - 12322 - 6993 - FC10 - ii

12322 Object

Focussed changes Appendix 5

FC10

the approach set out in paragraphs 49-53 of the statement of focused changes. This need not however constitute a full master planning exercise, but should interrogate in further detail:

- * Service provision within, and connectivity to the existing urban fringe;
 - * Strategic and local movement patterns (including the viability of an improved Bittern Line rail service and local tram/train provision within the wider growth triangle);
 - * How the existing infrastructure provision can be optimised to unlock development viably and incrementally.
 - * Further detailed consideration of the property market and economic characteristics of the area to inform the underlying viability/economic proposition.
- It should further identify:
- * The configuration of new transport infrastructure (inner link road, key connectors, cycle routes)
 - * The location of village and neighbourhood centres or strips based on the principle of 'ped-sheds' to increase walkability.
 - * Key 'unlocking' infrastructure/utilities and the thresholds at which this should be provided, subject to viability.
 - * An illustrative list of 'desirable' social infrastructure.
 - * An overall approach to the enhancement and creation of a valuable landscape setting and green infrastructure for the wider development.

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The TFT would expect to be a key stakeholder along with other land and property interests in the development of such as document.

Environmental priorities

Paragraph 35.

Please refer to responses to paragraphs 6 and 18-21 above.

Paragraph 36.

The TFT supports the concept of walkable neighbourhoods, which involves ensuring that walking and cycling is prioritised. However, on the grounds of personal safety and infrastructure efficiency, it rejects the concept of separated movement corridors. It, therefore, envisages that the urban extension promoted by the TFT should integrate a number of permeable route options that encourage people to move around, where the private car is considered at the bottom of the transport hierarchy, followed by public transport, cyclists and at the top, pedestrians. In general these routes should be designed to be overlooked so as to provide a level of personal safety.

It is recognised that such routes should form part of a wider objective to relieve pressure on the roads, promote healthier lifestyles, encourage people to enjoy the area outside of their cars and to create efficient modal shifts towards more sustainable modes of transport. The aspiration is to link a number of walking and cycling routes to a wider network. As such, it is considered that routes along which cycling and walking are prioritised should be provided locally and within the sub-region.

Further consideration should also be given to the provision of sustainable transport interchanges whereby walking, cycling and public transport routes converge, thus providing a choice of sustainable transport modes. The location of such interchanges should have regard to public services, facilities and major infrastructure elements and should be explored through the development of a strategic planning framework in the form of an SPD as set out in paragraphs 49-53 of the statement of focused changes.

Paragraph 37.

Please refer to responses to paragraphs 6 and 18-21 above.

Health, community safety and Community building

Paragraph 39.

It is the intention that the new urban extension promoted by the TFT integrates a variety of functional and usable open spaces to cater for existing and new communities. These will be defined to meet a range of objectives including the encouragement of walking to reduce the incidence of obesity and better health generally, the provision of access to sport and recreation, the promotion of mental well-being, social cohesion, and education and the creation of opportunities for local food and fuel production.

Relationship to existing Communities, Directions of growth and phasing

Paragraph 41.

Please refer to responses to paragraphs 2, 4, 8 and 16 above.

Paragraph 42.

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Please refer to responses to paragraphs 18-21 above.

Paragraph 43.

The TFT agree that discussion and coordination on phasing is required to ensure that the appropriate infrastructure is provided at the appropriate time to support new and existing communities. However, it is considered that the GNDP need to identify, with key stakeholders, what, where and when essential infrastructure is required to unlock distinct phases of development. As stated above, although the TFT do not object to proposals for the NDR and accept that it is important in supporting wider growth in the GNDP area, it is not

Statement of Focussed Changes (Joint Core Strategy)

12322 Object

Focussed changes Appendix 5

FC10

however considered to be essential to the delivery of significant amounts of growth in areas within the growth triangle that can be supported by other infrastructure options. The TFT have provided an alternative option to support growth on their land through the provision of an inner link road and it is suggested that this is given greater weight in the JCS in order that it is sound.

Paragraph 44.

The TFT object to the statement that there cannot be commitment to large-scale development in the growth triangle until there is sufficient certainty over the construction of the NDR. Whilst the TFT do not object to the proposed NDR and understand its significance to the Norwich Area Transport Strategy, it is wrong to say that no large scale development can take place without certainty of its delivery. There is clearly a housing need for the area (the housing need survey identifies this) and the requirement to provide job and business floorspace for this growing and changing economy (e.g. Aviva's movement away from the City centre) is self-evident. It is inadequate to simply say that without the NDR there can be no large scale growth.

In accordance with paragraph 26 of the statement of focused changes, the TFT have highlighted through these and previous responses to the JCS that an alternative option exists that would enable sustainable growth within this part of the growth triangle in the form of an inner link road (refer to the responses to paragraphs 1, 26 and 43 above). The location of the TFT landholdings benefit from strong links with the city centre which can be significantly improved through the delivery of initiatives such as the BRT and the inner link road identified in Broadland District Council's Local Plan, part of which has extant planning permission. As stated above, it is considered that this should be reflected in the JCS in order that it is sound.

Paragraphs 45 and 46.

The TFT object to these statements for the reasons set out above in responses to paragraphs 1, 26, 43, 44 and 47. It is considered that if it is considered that the implementation of an inner link road would enable some growth to come forward in advance/without the delivery of the NDR or Postwick Hub.

Paragraph 47.

As previously stated, a route for an inner link road has been safeguarded in part within Broadland District Council's existing Local Plan. This link road is safeguarded in two parts, one of which has an extant planning permission. However, it should be noted that the road as currently safeguarded, does not link. The 'missing section' is located within the area of land being promoted by the TFT. The provision of a complete link road in this location will enable the delivery of the urban extension in advance of the Northern Distributor Road. It will act to support north/south traffic, cycle and pedestrian movements around the periphery of Norwich and within the fabric of the new extension and encourage orbital movements, as described in paragraph 26, between the Broadland Business Park to the south and Wroxham Road to the north, thus relieving pressure on existing arterial routes. It would also create easier access to the park and ride facility on the Wroxham Road, potentially encouraging more people to use this facility and in turn, reducing commuter traffic into the city.

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Paragraph 48.

The TFT object to the statement that development in all quarters should progress concurrently. It is considered that this is unrealistic as there are a number of variables associated with the development process, including differing local land markets, legal issues, financing, funding, availability of grant and market conditions, that cannot be controlled through the planning process. It is possible to plan for growth without expecting that all sites identified will be developed simultaneously. The programme associated with the development of one site should not be beholden to another and will only act to stifle growth. A mechanism for the provision of key unlocking infrastructure at appropriate thresholds, needs to be developed. (see 50 and 51 below).

SPD/Masterplanning process

Paragraph 50 and 51.

The TFT support the development of an overarching high level strategic framework which would inform a supplementary planning document and an approach to the co-ordinated and viable provision of infrastructure within the growth triangle.

The TFT would welcome the opportunity to inform the development of the strategic framework, SPD and infrastructure approach in discussion with the GNDP, Broadland District Council and other local stakeholders, having regard to the effective coordination of the development of the individual quarters, a joined up approach to those aspects of the development that are identified to require a collective approach and other key considerations. As stated above, the TFT have amassed a wealth of information through detailed discussions and workshops in both the Ebd scoping sessions in May 2009 and the recent Charette held in July 2010. It is considered that the findings and outputs of these will assist in the production of the SPD and the 'daughter masterplan' for the land promoted by the TFT.

Statement of Focussed Changes (Joint Core Strategy)

O - 12327 - 8708 - FC10 - None

12327 Object

Focussed changes Appendix 5

FC10

Respondent: Mrs Ann Moy [8708]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No public exhibitions or meetings on the proposals to give the public an opportunity to find out more have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12328 - 8842 - FC10 - i, ii, iii

12328 Object

Focussed changes Appendix 5

FC10

Respondent: Mr Robin Saunders [8842]

Agent: N/A

Full Text:

Summary:

I do not believe it is reasonable for the Council to take powers to exclude public involvement in the development of the Joint Core Strategy. This policy is an enabling document to create a Strategic Allocation which will be administered using a Supplementary Planning Document. The use of an SDP covering the entire Growth Triangle and for the whole of the period of this plan as a device to take total control of housing development, is extraordinary and hugely undemocratic. It is also in direct contravention of the stated aims of the Government to give powers back to communities to decide how local planning should evolve. This will ignore Parish Plans and govern by dictat, which is completely unacceptable. The Localism Bill which the Government announced after the election, must be part of any consideration of Planning Policy for the future.

Statement of Focussed Changes (Joint Core Strategy)

O - 12331 - 8844 - FC10 - None

12331 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs R.J & E.M Saunders [8844]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Statement of Focussed Changes (Joint Core Strategy)

O - 12334 - 8845 - FC10 - None

12334 Object

Focussed changes Appendix 5

FC10

Respondent: Mr & Mrs David George [8845]

Agent: N/A

Full Text:

Summary: I wish to formally object to the Focused Changes:

- i) Replacement Policy 10(FC8 and FC9): Locations for major new or expanded communities in the Norwich Policy Area
- ii) Replacement Appendix 5 (FC10) Old Catton, Sprowston, Rackheath, Thorpe St. Andrew Growth Triangle Concept Statement

Please register me as an objector. In my view the Focused Changes are unsound for the following reasons:

1. The change in status from a broad location for growth for up to 10,000 new houses in north-east Norwich to a 'Strategic Allocation' has been introduced at a very late stage with inadequate time given to enable proper consideration of a detailed Concept Statement. No meaningful public exhibitions or meetings on the proposals, to give the public an opportunity to find out more, have been organised.
2. Re-labelling the north-east Norwich growth location as a 'Strategic Allocation', to be followed up by a Supplementary Planning Document rather than an Area Action Plan, is intended to speed up the planning process and avoid the requirement for a public examination.
3. I am concerned about the direct and indirect impacts of a large amount of growth on areas shown as environmental constraints on the Proposals Map accompanying Appendix 5 such as woodlands, open spaces and historic parklands. The area shown as 'white space' within the growth triangle (ie: land not yet developed and which is not identified as having environmental constraints) does not appear to have been assessed for its potential housing capacity. I am concerned that the proposed number of new houses could not be accommodated within the white space. Therefore, either some land identified as having environmental constraints would have to be sacrificed to development, OR, the proposed number of new buildings would have to be scaled down. The JCS and the Focussed Changes do not address this important issue.
4. I object in principle to the proposed development of up to 10,000 dwellings based around a Norwich Northern Distributor Road to the north-east of Norwich. As well as loss of countryside, a development on this scale will result in other adverse effects such as major traffic growth, notably on Wroxham Road and Salhouse Road.

Focussed changes: Sustainability Appraisal

O - 11816 - 8120 - Sustainability Appraisal (Focussed changes only) - i,

11816 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

Respondent: Mr E Newberry [8120]

Agent: N/A

Full Text:

Summary:

Having attended the 13th May 2010 meeting with the inspectors, on the Greater Norwich Development Partnerships Joint Core Strategy, and also taken part.

Having heard the concerns of the inspectors on the whole policy. Asking the partnership, to go away and give more consideration and clearer explanations to at least six of their concerns. One of the main concerns being the lack of any Plan 'B'.

After reading through the Statement of Focussed Changes, I cannot see any major changes to the original Greater Norwich Development Partnerships Joint Core Strategy for Broadland, Norwich and South Norfolk. Especially the total lack of any sign of a plan 'B'.

There is already a mammoth question mark as to the amount of development proposed being required, and in the light of the new governments likely cuts, to government related jobs will be reflected in the amount of development required. Many of the unfortunate who lose their jobs, will be hard pressed to hold onto their own houses let alone consider a new house. Also the standard to which the eco-towns buildings are built (level 4). This is far too low it should be at least level 6. This of course raises the cost of each building by at least £26 thousand pounds.

The agricultural land being good quality will be needed for the production of food products, a far greater necessity especially in the present climate of supply from other producers.

I think that the time in between now, and when this type of development might be needed if ever, which I predict will be 20-30 years at minimum could be used to create more realistic plans. A and B.

Still not addressing inspectors requirements as expressed on 13th May Meeting. So little change to plan and still no sustainability to sewers, water and necessary services. Still all too much reliance on one road. Namely NDR bypass Also another idea to exasperate area sustainability roads and supply of essential services required by Belmore proposals. There were 6 issues raised by inspectors.

Focussed changes: Sustainability Appraisal

O - 12184 - 7172 - Sustainability Appraisal (Focussed changes only) - Non

12184 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

Respondent: Norfolk and Norwich Transport Action Group (Ms Denise Carlo) [7172] **Agent:** N/A

Full Text:

Summary:

The SA is not legally compliant for the following reasons:

1. The SA fails to give sufficient weight to the legal requirement on Consultations under Article 6(2) of the SEA Directive:

"and the public....shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme.....".

Contrary to the Directive:

- the public has been consulted on major proposals at a very late stage.
- the consultation is a rushed paper exercise, unaccompanied by any public exhibitions or meetings to explain the proposals, in particular the detailed concept statement on north-east growth triangle.
- the length of time between the consultation deadline (30 August), local authority meetings to discuss responses (late September/mid October) and the Examination (8 November) is insufficient to enable any major changes to be made to the plan.

- the SA is inadequate in relation to the SEA Directive in assessing the standard of public consultation. The SA identifies the need for early and effective participation only at a future stage but not at the present:

'Give further detail regarding the degree/nature of participation that is necessary when developing future masterplans. For example, it might be appropriate to require that 'key choices are informed by early and effective participation.' (1)

The purpose of Broadland District Council in seeking to reclassify the north-east growth triangle as a 'strategic allocation', for enabling future work to be progressed through a Supplementary Planning Document (SPD) rather than an Area Action Plan (AAP), is to avoid the requirement of an Examination in Public.(2) Also, preparation of a SPD no longer requires sustainability appraisal.

The SA ignores the fact that reclassification of the growth triangle as a 'strategic allocation' would limit the scope for the public to influence any SPD beyond minor changes.

NNTAG is also concerned that fixing the boundaries of the growth triangle through its re-classification as a 'strategic allocation' fixes the line of a NDR and would make it difficult to challenge the NDR route at a local planning inquiry.

2. The SA of Focused Changes is based on incomplete evidence base

Missing gaps remain in the baseline evidence identified by the Inspectors in their letter of 24 May in relation to the north-east growth triangle (eg provision of information on soundness relating to public transport infrastructure and to relocated and new rail stations at Rackheath and Broadland Business Park cited as key justifications for locating a major urban extension to north-east of Norwich). Outputs from the GNDP work programme (27 June 2010) for preparation for the examination have not been published to assist either the SA or the public in responding to the present consultation.

In awarding positive scores in the assessment of Objective ENV1 "To reduce the effect of traffic on the environment", the SA appears to accept the statements in revised Policy 10 and Appendix 5 on public transport provision on the basis of incomplete evidence.

3. The SA fails to address the need for alternatives to growth triangle in the event of NDR/Postwick Hub not going ahead

PPS12 advises that,

"Sustainability Appraisal should provide a powerful means of proving to decision makers and the public that the plan is the most appropriate given reasonable alternatives". (4.43)

There have been several signals from central government about the uncertainty of public funding for a NDR. Also, the making of Draft Slip and Side Road Orders for implementing Postwick Hub cannot be guaranteed in view of Ministers' decision to hold a local inquiry, depending on the Spending Review. Their letter states:

".....the Secretaries of State are satisfied that in the circumstances of this case the remaining objections raise issues of such significant public importance that they should be debated publicly at a local inquiry and that an inquiry is likely to produce significant new information relevant to their decision". (3)

Focussed changes: Sustainability Appraisal

O - 12184 - 7172 - Sustainability Appraisal (Focussed changes only) - Non

12184 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

The SA fails to acknowledge the uncertainties surrounding a NDR on which the growth triangle 'strategic allocation' is predicated. Yet the same consultants (Scott Wilson) who prepared the SA, were also responsible for the Integrated Sustainability Appraisal of the Review of the East of England Plan 2008 - 2031 published in March 2010 in which they noted:

"Potential Problems stemming from the uncertainty associated with the delivery of the NDR and the critical role that it plays in the delivery of Greater Norwich ISA sub-area policies, including housing provision, could be partially mitigated by identifying contingencies in the event that the road is not delivered". (4)

(1) SA of Focused Changes made to the Submission Joint Core Strategy - North-East Growth Triangle: Recommendation bullet point 6 (page 18).

(2) Discussion of the benefits and risks of adopting a Supplementary Planning Document as an alternative to an Area Action Plan (section 9) for preparing a planning framework for the north-east growth triangle in 'Production of a Supplementary Planning Document for the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle'. Report to Broadland District Council Cabinet on 22 December 2010.

(3) Letter 2 August 2010 from Government Office for the East Midlands in relation to A47 Trunk Road Postwick Interchange Slip and Side Roads Order.

(4) Section 6: How can we mitigate / enhance effects, Table 2: Scott Wilson's recommendations to EERA in Integrated Sustainability Appraisal of the Review of the East of England Plan 2008 - 2031". (March 2010)

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, iii

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

Respondent: Landstock Estates Ltd & Landowners Group [8809] **Agent:** Barton Willmore (Mr Andrew Wilford) [8811]

Full Text:

Summary:

1.1. These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group in response to the Greater Norwich Development Partnerships (GNDP) consultation on its 'Statement of Focussed Changes' (SoFC). It is our understanding that the SoFC has been specifically published to address what the GNDP considers are those issues that require further changes following the articulation by the Inspectors' of their concerns over the submitted Joint Core Strategy (JCS) before, during and after the Exploratory Meeting (EM) held on 13th May 2010.

1.2. The SoFC has been accompanied by two supporting documents, namely, a Sustainability Appraisal Report (July 2010) (SA) prepared by Scott Wilson and an Affordable Housing (AH) Viability Study (July 2010) prepared by Drivers Jonas Deloitte.

1.3. The SoFC only relates to 3 elements of the JCS. These are:

- * Provision of Gypsy and Traveller Pitches;
- * Affordable Housing; and,
- * The North East Norwich Strategic Allocation.

1.4. Representations have been made at every stage of the JCS process; and it is noted that this current consultation can only comment on soundness issues relating to the SoFC. We are mindful of this fact, but would like to remind the GNDP our ongoing soundness concerns relating to the submitted JCS as set out in our previous representations at the Issues and Options Stage, the Preferred Option Stage and the two Counsel's Opinions.

1.5. In summary, we conclude that the SoFC does not represent an adequate attempt by the GNDP to address the matter of particular concern raised at the EM on 13th May 2010 and as set out in the 15 page Note (EIP 35) circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' (dated 24th May 2010). EIP 35 set out that there were 6 areas of concern on which the Inspectors considered that further work was needed. These related to:

- i) Infrastructure;
- ii) Affordable Housing;
- iii) Distribution of Development, particularly in relation to public transport opportunities;
- iv) Northern Distributor Road;
- v) Sustainability Issues; and
- vi) The North-East Growth Triangle.

1.6. It is therefore surprising that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 (EIP 36) to clarify and note the Inspectors' concerns and set out the GNDP's suggested way forward on a number of these matters.

1.7. Notwithstanding our concerns regarding the additional matters upon which the GNDP has chosen not to respond, we set out below our comments on the focused changes, namely, those in relation to affordable housing and the proposed strategic allocation at NE Norwich, and the SA addendum and AH Viability Study that support the SoFC. Even in respect of these matters, alone, we contend that the JCS remains unsound.

- i) Objections to the Lack of the Sustainability Appraisal Tested Options for North East Norwich

4.1 The SoFC sets out the amendments to 'Policy 10: Locations for Major New, or Expanded, Communities in the NPA' and in particular now includes a revised Appendix 5. We are surprised that the SoFC does not address or test a 'Plan B' in the light of the uncertainty over the deliverability of critical infrastructure. This was described as the 'what if' scenario by the Inspectors at the EM. From our experience of other emerging and approved Core Strategies a sound 'Plan B' will usually be constituted by a mix of 'Plan, Monitor & Manage' (PMM) and Reserve sites, or, alternative capacities at other locations to ensure suitable flexibility in the plan.

4.2 At the EM the Inspectors offered the GNDP the opportunity to present a Plan 'B' option in NE Norwich if sufficient uncertainty were to arise as to the delivery of the critical infrastructure. It is our understanding that the GNDP considers that its Plan 'B' would be a smaller development in NE Norwich e.g. one related to the Postwick Hub or land linked to a distributor road north to south linking the radials. However, such a 'Plan B' has not been coherently explained. In any event we consider a sound 'Plan B' must be more fundamental, refer to the consequences of not achieving the identified growth in NE Norwich, and, identify replacement locations and/or release mechanisms across the NPA.

4.3 This issue was explored at the EM and Mr Kirby is recorded as saying that there was no 'alternative strategy' or 'Plan

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, iii

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

B'. Accordingly, it is our understanding that the GNDP must have, by that stage, already accepted that there could be no 'what if' scenario. As an 'all or nothing' strategy, the consequence of this approach, as the SoFC has highlighted, remain an ineffective and unsound Core Strategy; for paragraph 4.44 of PPS12 clearly states 'Core Strategies must be effective: this means they must be : deliverable, flexible and able to monitored'.

4.4 The lack of any real 'Plan B' results in little to no flexibility within the plan and as such 'a strategy is unlikely to be effective if it cannot deal with changing circumstances' (para. 4.46 PPS12). Paragraph 4.46 continues: 'Plans should be able to show how they can handle contingencies: it may not always be possible to have maximum certainty about the delivery of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as means of handling uncertainty'. (our emphasis)

4.5 It was fully expected that this current consultation would at least explore a 'Plan B' as a SA option and assess the preferred strategy against reasonable alternatives to demonstrate that a) the preferred approach selected was the most suitable and b) in the light of the failure to deliver the infrastructure projects, how would the plan continue with the delivery of the housing and employment growth. This has not happened and this is a failure of the SoFC (and the SA), as it only addresses 3 matters.

4.6 Indeed, unlike other Core Strategies (such as Horsham or Rochford), the GNDP has consistently chosen not to identify reserve sites or other flexibility mechanisms to maintain its delivery of housing land. This has, historically, been reflected in the constant failure, as at the current time, in achieving a PPS3 compliant five year supply of land.

4.7 The lack of flexibility in not providing for a Plan B was also raised at the EM. An alternative strategy was considered necessary to be explored in the light that a number of locations identified for growth are reliant on the delivery of infrastructure projects such as the Northern Distributor Road or the Long Stratton Bypass. The SA (July 2010) identifies on p10 that only 3,200 units could be delivered without the NDR but with the Postwick Hub. We question what flexibility is written into the plan to allow for the remaining 6,200 units to be delivered if the NDR fails to be constructed? When was that option tested that demonstrates how 3,200 dwellings connected to the Postwick Hub are deliverable?

4.8 The lack of a Plan 'B' is critical to not only the Strategic Allocation but the JCS as a whole. Paragraph 31 of the Inspectorate Guidance Learning From Experience document (September 2009), sets out that 'Matters that impact on the rest of the plan area will also need to have been resolved'. This is fundamental to the Strategic Allocation and the Plan 'B'. If the NDR is not delivered and the quantum of growth can not be suitably accommodated in NE Norwich, then growth is required to be delivered elsewhere in the NPA that has the capacity, or ability to deliver the necessary infrastructure and thus the housing.

4.9 These 'alternative' options' have not been presented within the current SoFC nor tested within the current SA (July 2010). Such an approach is both contrary to the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations 2004. Under the SEA Directive: "Where an environmental assessment is required... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (our emphasis). These requirements are also repeated in Regn. 12(2)(b) and Sched. 2, para. 8 of the Environmental Assessment of Plans and Programmes Regulations 2004 (see Appendix B).

4.10 Rather, the SA (July 2010) has only assessed two options for the North East Norwich Growth Area namely:
Option 1: Strategic Site; and
Option 2: Non-Strategic Site.

4.11 This is a fundamental shortcoming of the SEA process undertaken by the GNDP as no suitable 'alternative options' (i.e. Plan 'B') have been tested against the inclusion of the delivery of a Strategic Allocation. Our views on the original Sustainability Appraisal are well documented in previous representations to the JCS process and not repeated here. The JCS needs to be flexible (i.e. allow for a 'Plan B') and that in itself needs to be subject to an SEA/SA. The JCS fails in both instances.

4.12 Furthermore, the SA (July 2010) relies on the original Scoping Report for the JCS dated 2007 (footnote on p2 of the SA). This scoping report does not provide for an assessment of a 'Strategic Allocation' and therefore the current SA (July 2010) is not in accordance with the scoping report on which it has been based. A scoping report addendum testing further alternatives should have been prepared and more importantly 'consulted'.

4.13 The continuing need to "consult" is highlighted within the SEA Directive, which requires that 'authorities with environmental responsibilities and the public shall be given an early and effective opportunity within appropriate time frame to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme'.

4.14 This is underpinned by PPS12 where paragraph 4.37 states 'the evidence base should contain two elements:
* Participation: evidence of the views of the local community and others who have a stake in the future of the area.
* Research/fact finding; evidence that the choices made by the plan are backed up by the background facts.'

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, iii

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

4.15 Since change emanates from engagement, and, on that basis the reasonable alternatives are identified and tested, paragraph 4.38 of PPS12 states 'It requires the local planning authority to seek out and evaluate reasonable alternatives promoted by themselves and others'. Paragraph 4.43 identifies the importance of the Sustainability Appraisal in this process and advises: 'Sustainability Assessment should inform the evaluation of alternatives. Sustainability Assessment should provide a powerful means of proving to decision makers, and the public, that the plan is the most appropriate give reasonable alternatives'.

4.16 Therefore, if this advice had been correctly followed then the GNDP, in promoting NE Norwich as a Strategic Allocation in the SoFC, should have also published a 'Plan B' as the non delivery of the Strategic Allocation would constitute 'matters that impact on the rest of the plan area'. As the GNDP has yet to identify a genuine Plan B this issue has not been resolved sufficiently to support a 'Strategic Allocation'. Furthermore, the SA that currently supports the SoFC and the Strategic Allocation is flawed in what it has assessed. These matters go to the heart of the JCS and again demonstrate its unsoundness.

5.1 Our view of the soundness of the JCS is well documented in previous representations and engagement at the EM on 13th May 2010. It is still clear that the matters of Affordable Housing and the Strategic Allocation remain unsound. There no doubt that the short consultation on these issues has not repaired the position as outlined by the Inspectors. The real problem is that with a front loaded plan which has been developed over a number of years, it is impossible to play catch up on such significant issues.

5.2 The SoFC fails to address all the outstanding issues as set out by the Inspectors and has attempted to retro-fit the Sustainability Appraisal and JCS to suit the inclusion of the 'Strategic Allocation' and justification for the current level of Affordable Housing.

5.3 The JCS continues to be unsound, and the GNDP have failed to adequately consult on the SA or undertaken the very basic necessity of scoping correctly to allow an updated SA to be undertaken.

Appendix B

Environmental Assessment of Plans and Programmes Regulations 2004
(reg 12(2)(b) and Sched. 2, para. 8)

Preparation of environmental report

12. - (1) Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report in accordance with paragraphs (2) and (3) of this regulation.

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of -

(a) implementing the plan or programme; and

(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of -

(a) current knowledge and methods of assessment;

(b) the contents and level of detail in the plan or programme;

(c) the stage of the plan or programme in the decision-making process; and

(d) the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

(4) Information referred to in Schedule 2 may be provided by reference to relevant information obtained at other levels of decision-making or through other Community legislation.

SCHEDULE 2 Regulation 12(3)

INFORMATION FOR ENVIRONMENTAL REPORTS

1 An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plan and programmes.

2 The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.

3. The environmental characteristics of areas likely to be significantly affected.

1 Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds[10] and the Habitats Directive.

2 The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

3 The likely significant effects on the environment, including short, medium and long-term effects, permanent and

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, i

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as -

- (a) biodiversity;
- (b) population;
- (c) human health;
- (d) fauna;
- (e) flora;
- (f) soil;
- (g) water;
- (h) air;
- (i) climatic factors;
- (j) material assets;
- (k) cultural heritage, including architectural and archaeological heritage;
- (l) landscape; and
- (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).

1 The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.

2 An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.

Appendix C

Copy Letters between BW and GNDP

Sandra Eastaugh
GNDP Manager
PO Box 3466,
Norwich,
NR7 7NX
02 August 2010

16197/A3/AW/mg

Dear Mrs Eastaugh

**GREATER NORWICH DEVELOPMENT PARTNERSHIP JOINT CORE STRATEGY
STATEMENT OF FOCUSSED CHANGES JULY 2010**

We refer to the public consultation currently being undertaken by the GNDP relating to the Statement of Focussed Changes (SoFC) July 2010. We record that the SoFC, along with a supporting Sustainability Appraisal (SA) report (July 2010) and an Affordable Housing Viability Study (July 2010) have been released in response to the Inspectors' continuing concerns following the Exploratory Meeting (EM) on 13th May 2010 and future Examination in Public.

This letter does not set out our clients' formal representations to the current consultation (these will follow at a later date) but seeks to highlight to the GNDP our continuing concerns relating to the current SoFC and its failure to address the other issues that formed part of the EM in May 2010, bearing in mind the short timescales before the Examination opens in early November.

We have 3 main areas of concern:

1. The "Focussed Changes" Upon Which Consultation Is Taking Place

We are concerned that the focussed changes only relate to 3 elements of the Joint Core Strategy (JCS). These are:

- i) Provision of Gypsy and Traveller Pitches;
- ii) Affordable Housing;
- iii) The North East Norwich Strategic Allocation.

It was clear at the EM and the 15 page Note circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' dated 24th May 2010, that there were 6 areas of concern. These related to:

- vii) Infrastructure;
- viii) Affordable Housing;
- ix) Distribution of Development, particularly in relation to public transport opportunities;
- x) Northern Distributor Road;

Focussed changes: Sustainability Appraisal

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

- xi) Sustainability Issues; and
- xii) The North-East Growth Triangle.

It is therefore disappointing that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 to clarify and note the Inspectors concerns and set out the GNDP's suggested way forward on a number of these matters.

As mentioned above, our representations on these matters will follow in due course in accordance with the consultation timetable. However, we consider the current SoFC does not adequately address all the areas of concern that are required to be consulted upon in order to 'repair' the JCS in its current format. At the very least, by way of example, the SoFC should have published for consultation what the GNDP consider to be the 'critical' infrastructure versus 'non-critical' infrastructure so that the services authorities could comment on this particular issue.

2. Timeframe to Examination

We have noted the anticipated timescales set out in the SoFC and seek clarification on these specific dates. We recognise the current consultation period ends on 30th August 2010 relating to the SoFC but that on 4th October 2010 (5 weeks after the close of the consultation) further information will be submitted to the Inspectors by the GNDP. We understand this will relate to the background evidence work currently still being progressed.

We question at what point consultation will take place on these additional documents? Given that this date is only 4 weeks ahead of the proposed start date of the Examination, we do not consider this is an appropriate or fair timetable to review the additional documentation. This is especially so when the current SoFC contains little information that relates to the 6 areas of outstanding issues as identified by the Inspectors.

Recent correspondence sent to the GNDP from the Inspectors (23rd July 2010) has questioned the GNDP's approach to the JCS in the light of recent Government Changes. The Inspectors have identified that 'It would be helpful if this paper could be made available as an examination document before 23 August so that we can take account of it in our invitation participants to respond in writing to the matters that we will be identifying for discussion at the hearings.'

It is perfectly clear from this request that the Inspectors require sufficient time to review the response and determine an appropriate course of action. We therefore question how new examination documents can be submitted to the Inspectors as late as the 4th October i.e 4 weeks prior to the start of the examination. Can these documents be suitably and adequately considered by the Inspectors as well as providing a period of consultation to allow representations to be made? The Inspectors have clearly identified that the 23rd August is an appropriate timescale to consider new matters; and yet the current timetable suggests that information will be submitted up to 6 weeks after that date.

The "Local Development Frameworks Examining Development Plan Documents: Procedure Guidance August 2009 (2nd Edition)" sets out in paragraphs 3.6 - 3.9 the appropriate timeframes and manner in which to conduct the pre-hearing meetings, the content and deadline for the submission of statements by participants and the proposed timetable for the hearing. In all, the pre-hearing meeting should take place approximately 6 weeks in advance of the opening of the examination.

Notwithstanding, the Inspectors have identified that a further pre-hearing meeting is not required (11th June 2010) ahead of the Examination. Given that the GNDP intend to submit new information in early October, the Inspectors are likely to require 2 weeks to consider and conclude on these documents and prepare for the Examination. They must also ensure that all parties have approximately 4 weeks to prepare their additional statements and a further 2 weeks for the Inspectors to familiarise themselves with those statements. Realistically, some 8 weeks must elapse between the submission of the GNDP's further findings to the opening of the Examination.

Nevertheless, on 11th June 2010, the Inspectors sent an email to the GNDP and stated 'As my guidance material for the PHM made clear, the Inspectors intend to provide participants with an opportunity to respond in writing to the list of matters that we will identify for the hearings. We plan to issue this on or about 16 August, by which time any proposed changes with your own timetable, have been advertised, with responses to be submitted within 4 weeks (ie by 13 September).'

The current timetable does not conform with the Inspectors request as table 1 below demonstrates that the Inspectors intend to circulate Inspector Matters either on the 16th August or, based on their most recent correspondence, after 23rd August with a maximum of 4 weeks to respond to matters. This deadline is either 13th September or sometime shortly after 20th September (based on latest correspondence). It is evident the timetable for the JCS is running ahead of the democratic process of the GNDP and the participating Local Authority bodies as each Authority (including the GNDP itself) does not have a Committee Meeting to agree the representations received and any necessary changes to the SoFC before representations on matters arising are submitted. Furthermore, at present, the Written Statements that will form the basis of the hearing sessions are required to be submitted before the GNDP has submitted all the evidence on 4th October 2010.

Table 1: Current Event Timetable for JCS Examination

Event

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, iii

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

Date Source
Consultation on SoFC 19th July -
30th August 2010 SoFC
Circulation of Inspectors Matters Arising 16th August 2010 Email from PO to GNDP dated 11th June 2010
Submission of Statement in response to Inspectors Questions re. Government Changes 23rd August 2010 Inspectors letter dated 23rd July 2010
Responses required to be submitted to Inspectors based on matter arising 13th September 2010 Email from PO to GNDP dated 11th June 2010
Policy Group meeting
23rd September 2010 SoFC
Broadland DC Meeting
28th September SoFC
Norwich City Council Meeting
28th September 2010 SoFC
South Norfolk District Council Meeting
TBC SoFC
Submission of Additional Documents to the Inspector
4th October 2010 SoFC
Norfolk County Council Cabinet Meeting
11th October 2010 SoFC
Examination in Public
8th - 19th November 2010 SoFC
Adoption
March 2011 SoFC

Given that the Inspectors require written statements to be submitted 4 weeks after the circulation of Matters, and some 4-5 weeks ahead of the start of the Examination (based on the 11th June 2010 correspondence) it is therefore unlikely that the Examination can safely commence in early November if the GNDP intend to submit new information in October.

3. Sustainability Appraisal

One fundamental issue that surrounded the soundness of the JCS and which was discussed at length at the EM was the lack of flexibility in providing for an 'alternative' or fallback strategy (or a Plan B). An alternative strategy or 'Plan B' was considered necessary to be explored in the light that a number of locations identified for growth are reliant on the delivery infrastructure projects such as the Northern Distributor Road or the Long Stratton Bypass.

It was therefore expected that the GNDP would assess the preferred strategy against reasonable alternatives to demonstrate that a) the preferred approach selected was the most suitable and b) in the light of the failure to deliver the infrastructure projects, how would the plan continue with the delivery of the housing and employment growth. This was described as the 'what if' scenario in the Inspectors Guidance.

We have noted that these 'alternative' options' have not been presented within the current SoFC nor tested within the current SA (July 2010). Under the SEA Directive: "Where an environmental assessment is required... an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated" (our emphasis)

The SA (July 2010) has only assessed two options for the North East Norwich Growth Area namely:
Option 1: Strategic Site; and
Option 2: Non-Strategic Site.

This is a fundamental shortcoming of the SEA process undertaken by the GNDP as no suitable 'alternative options' (i.e. Plan B) has been tested against the inclusion of the delivery of a Strategic Allocation. Our views on the original Sustainability Appraisal are well documented in previous representations to the JCS process.

Furthermore, the SA (July 2010) relies on the original Scoping Report for the JCS dated 2007. This scoping report does not provide for an assessment of a 'Strategic Allocation' and therefore the current SA (July 2010) is not in accordance with the scoping report on which it has been based. A scoping report addendum testing further alternatives should have been prepared. We would suggest that Scott Wilson need to explain how this can proceed to a formal report without an up to date scoping report.

The SEA Directive requires that 'authorities with environmental responsibilities and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme'.

The Planning Inspectorate has further emphasised, within LDF's Lessons Learnt (June 2007), that: "At examination, LPA will need to show a clear trail of options generation, appraisal, selection or rejection and the role that Sustainability Appraisal (SA) and community engagement have played in this process"

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, iii

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

We are concerned that the current SA does not demonstrate or test the 'suitable alternatives', and, that insufficient scoping or public consultation has been undertaken to allow an appropriate time frame to express opinions. Given the lack of a 'Plan B' in this current consultation, or how the preferred strategy was reached (and supported by an SA), we can only assume that this will be submitted as part of the new evidence to the Inspectors on 4th October 2010. We therefore question how this provides for sufficient consultation to take place in accordance with the SEA Directive.

We request that the further issues (as outlined by the Inspectors above), and, the proposed submission of new evidence are addressed in a more timely fashion in order to allow all interested parties the opportunity to review and comment ahead of the forthcoming Examination.

Yours sincerely

LEE NEWLYN
Senior Partner

cc: Phil Kirby : Broadland District Council
Paul Rao : Norwich City Council
Andrew Gregory : South Norfolk District Council
Simon Osborne : GNDP JCS Programme Officer
Graham Tuddenham : Landowners Group
Damon Turner : Landstock Estates
John Pugh-Smith : 39 Essex Street Chambers

Lee Newlyn
Senior Partner
Barton Willmore
The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF

6th August 2010

Dear Mr Newlyn,

Greater Norwich Development Partnership Joint Core Strategy Statement of Focussed Changes

Thank you for your letter of 2nd August detailing your concerns over the Statement of Focussed Changes (SoFC) and its timescales.

1. 'Focussed Changes'

All areas raised by the Inspectors are being addressed by either the SoFC, or by drawing together the existing data into other documents that will add clarity and signpost the Inspectors to evidence already submitted.

The Inspectors have not expressed any objections or concerns to the way forward suggested by the GNDP.

The GNDP have been and continue to meet with service providers to discuss the Joint Core Strategy, the growth agenda and their financial planning processes and delivery mechanisms to see if there are common areas where we can work together.

The notes of these meetings will be summarised, collated and shared with the Inspector, the meetings continue through the autumn and beyond.

2. Timeframe to Examination

The GNDP are working to the timeframe as laid out by the Inspectors. An update on progress towards completing the work in advance of the hearings will be submitted to the Inspectors shortly via the Programme Officer. If the Inspector has any concerns on the timetable he will make us aware.

Focussed changes: Sustainability Appraisal

O - 12239 - 8809 - Sustainability Appraisal (Focussed changes only) - i, ii, i

12239 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

3. Sustainability Appraisal

Documentation regarding the Sustainability Appraisal will be made available in line with the Inspectors' timeframe.

I note that your letter has been copied to the Programme Officer, who will ensure that your concerns are passed on to the Inspector. Your letter and this reply will be added to the evidence base.

Yours sincerely,

Sandra Eastaugh
GNDP Manager

cc: Phil Kirby, Broadland District Council
Paul Rao\Graham Nelson, Norwich City Council
Andrew Gregory, South Norfolk District Council
Simon Osborne, Programme Officer
Graham Tuddenham, Landowners Group
Damon Turner, Landstock Estates
John Pugh Smith, 39 Essex Street Chambers

Focussed changes: Sustainability Appraisal

O - 12303 - 8440 - Sustainability Appraisal (Focussed changes only) - i, ii, i

12303 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

Respondent: Mr Ivan Smith [8440]

Agent: N/A

Full Text:

Summary: [none supplied]

Focussed changes: Sustainability Appraisal

O - 12306 - 8309 - Sustainability Appraisal (Focussed changes only) - i, ii, i

12306 Object

Sustainability Appraisal (Focussed changes only)

Sustainability Appraisal (Focussed changes only)

Respondent: Mr David Smith [8309]

Agent: N/A

Full Text:

Summary: [none supplied]

Focussed changes: Affordable Housing Study

O - 12201 - 8234 - Affordable Housing Study - i, ii, iii

12201 Object

Affordable Housing Study

Affordable Housing Study

Respondent: Lothbury Property Trust Company Ltd [8234]

Agent: Landmark Planning Ltd (Mr Peter Wilkinson) [6976]

Full Text:

Summary: There are significant flaws that render all calculations with regards to the viability of housing schemes inaccurate. These have been outlined below:

1. The Council have assumed a figure of £7,000 per unit is requested towards all Section 106 contributions and future CI costs not exceeding £15,000 (higher option) (see attachment 1 - Council's Affordable Housing Viability Study). This would appear to be a significant undervaluation, as this only just exceeds the education contribution for individual properties (£6,436 - see attachment 2). Some current developments at present take advantage of capacity within existing schools to reduce this figure, but this situation cannot be maintained. The suggested figures, particularly the Section 106 figure, do not even cover frequently requested requirements, such as open space. In addition, significant additional costs are usually necessary for a variety of requirements, including highways, archaeology, flood risk/drainage and ecology. Ground works, infrastructure and developer contingency costs also have the potential to significantly increase the associated costs with developing a site.

A good example of this is the current application submitted by Lothbury Property Trust Company Ltd at Brook and Laurel Farm, Thorpe St. Andrew (Application No. 20090886). With education requirements, on site open space provision, extra highway infrastructure, drainage costs etc, it is estimated that c. £18.6 million is required for the residential element of the scheme, or £31,000 per dwelling. This is 4.3 times that estimated in the Housing Viability Assessment. The figure in this example is comparable to that identified as necessary for a residential tariff for funding infrastructure for the Growth Area within Broadland District (£28,603 per dwelling in the Greater Norwich Infrastructure Needs and Funding Study (October 2009) - see attachment 3). This supports a considerably higher figure and discredits lower figures cited by the Council in the Affordable Housing Viability Assessment. Such a variation clearly indicates that the Council's assumptions regarding costs are inaccurate and compromises the resultant viability calculations.

2. The Council's estimates regarding land values and how these have been fed into the different scenarios are questionable. In the Growth Triangle, most housing development will take place on greenfield land. The Council Affordable Housing Viability Study suggests a land value of between £500,000 - £750,000 per hectare - see attachment 4. Even given the recession, a higher range of £750,000 - £950,000 per hectare (300,000 - £400,000 per acre) should be considered low, and this is notably higher than that suggested by the Council.

Whilst it is accepted that land values have fallen in recent years, given the timeframe for which work towards the LDF commenced, most developers would have secured options on greenfield sites before the reduction in values occurred. Before the recession, values were easily double those in the Council's Viability Assessment. This changes the base figure against which subsequent calculations need to be undertaken.

At the Consultation Meeting with regards to the Affordable Housing Viability Assessment in Spring 2010, I made the point that actual worked examples, particularly of land values, need to be provided to justify the assessment. Drivers Jonas Deloitte, who prepared the Affordable Housing Viability Assessment on behalf of the Greater Norwich Development Partnership accepted that this would provide clarity to the workings. No such worked examples have emerged.

The Council's Affordable Housing Viability Assessment has taken an inconsistent approach towards market forces, so that a positive spin is placed on the results. It is only current land values that have been incorporated into the calculations, with disregarding values before the recession occurred, even though it is from this period that options on land would have been agreed. In contrast, the prediction for development values are based on both current and revised upward values, on the assumption of development beyond the recession. This creates a strong bias in favour of the Council for supporting the Viability Appraisal, despite references to the report taking a 'pessimistic' stance.

3. Despite the inaccuracies noted above, insertion of the low cost figures into calculations in the Affordable Housing Viability Assessment, still only identifies 30% of schemes as being likely to support 40% affordable housing for the 'base' assumptions (chart 1) and 47% on the 'refined' (i.e. higher market values) assumptions (chart 3). Neither figure concludes that the market can support such a high percentage. These figures are increased on the assumption that grant money is available to assist with construction of affordable housing. At present, the Coalition Government are significantly reducing the monies available for such grants, and no assumptions on such monies being available can realistically be incorporated. This point is stressed in the Inspector's Conclusions from the Exploratory Meeting for the Joint Core Strategy (page 3). In light of the inaccuracies cited in points 1 and 2 above (and the lack of 'real' examples), the level of sites capable of providing a 40% affordable housing contribution will be lowered even further below the figures identified by the Council's report. It is not logical to incorporate a policy setting out a requirement, in which a high proportion of developments cannot comply. Setting an unrealistic target is instigating unnecessary additional work for developers and discouraging development as a whole within the area.

The inaccuracies in the background information does not provide a robust and credible evidence base upon which to formulate policies. This section of the Core Strategy is therefore contrary to PPS 12 paragraphs 4.36, 4.37 and 4.52 (+ accompanying box) and is thus unsound.

Focussed changes: Affordable Housing Study

O - 12201 - 8234 - Affordable Housing Study - i, ii, iii

12201 Object

Affordable Housing Study

Affordable Housing Study

Works required to become sound

Further evaluation of Affordable Housing Viability incorporating the analysis identified above.

Attachment 1: Extract from the greater Norwich Development Partnership's Affordable Housing Viability Study (July 2010)

8.9 Housing Market

We have sought to reflect changes in strength in housing markets. The main areas that this affects are:

* a developer's perceived risk of undertaking a scheme, and consequently the profit that the developer seeks; and

* the demand from the market for any completed units, and consequently the rate at which completed units sell.

Our study appraises three scenarios to reflect weak, neutral or strong market conditions, with sales rates varying between 2 and 7 units per month, and developer's profits as follows:

* 17.5% on cost in a strong market;

* 20% on cost in a neutral market; and

* 25% on cost in a weak market.

8.10 Section 106 and CIL Costs

Section 106 costs can vary greatly from scheme to scheme. We have followed guidance available on Broadland's and Norwich's websites, which suggest around £7,000 per unit is sought.

We have discussed this sum with members of GNDP, who ordinarily work in a planning capacity within the Local Authorities that make up GNDP. Whilst both lower and higher costs are secured on a site specific basis, it was believed that £7,000 per unit is representative of an approximate average over the policy area.

The future of the Community Infrastructure Levy (CIL) is uncertain, as is the quantum of any payments that may be required as part of it. As an aside from the main study, we have been asked to consider the impact on viability of potential CIL costs.

We have considered the impact of the following planning obligation costs:

* £7,000 per unit on all units (current section 106 cost assumption);

* £10,000 per unit on private market units only (potential future CIL scenario);

and

* £15,000 per unit on private market units only (potential future CIL scenario).

8.11 Other

As part of the Study, we have assumed a number of fixed costs. These include:

* Professional fees: 12% of construction cost

* Contingency: 5% of construction cost

* Planning costs: £300 per unit

* Finance: 6.5%

* Sales & Marketing Costs: 3.5% of GDV

Our Study, as requested by GNDP, builds on work already undertaken by a group of consultants led by AECOM. This work formed part of the evidence base for the Joint Core Strategy for Broadland, Norwich and South Norfolk, and was also used to inform the development of the Greater Norwich Integrated Development Plan.

22 Greater Norwich Development Partnership Affordable Housing Viability Study

Attachment 2: Broadland District Council Section 106 Contributions Proposal for Application 20090886 - 600 houses plus employment land (July 2010)

The breakdown of the types of dwellings proposed for this development has been expressed as a percentage in the application pack. This results in the following types and numbers of dwellings:

1 bed flats: 96

2 bed flats: 12

3 bed houses: 300

4 + bed houses: 180

Total: 588

The application form states that are 600 houses, but the percentages do not add up to this total. For the purposes of the calculations the figure of 588 will be used. As such the education contribution will be less than will be required, but the library, fire hydrant and transport contributions will be made on the assumption of 600 dwellings..

Focussed changes: Affordable Housing Study

12201 Object

Affordable Housing Study

Affordable Housing Study

Education Contribution

The cost per dwelling for a house (multi-bed) is £6,436.
The cost per dwelling for a flat (multi-bed) is £3,218.

Houses: $6436 \times 480 = £3,089,280$
Flats: $3,218 \times 12 = £38,616$

Total: = £3,127,896

However, there is no nursery contribution required as there is spare capacity in the area so £489 can be taken off the cost per each dwellinghouse (note this was not on the flats in the first instance).

Houses: $489 \times 492 = £240,588$

Total contribution with nursery contribution taken off = £2,887,308

Furthermore there is some spare capacity at the new Dussindale Primary School and 128 of the proposed properties are exempt from contribution.

Cost per house of primary provision = £2,958
 $£2,958 \times 128 = £378,624$

This figure is then subtracted from the total contribution with nursery contribution taken off.

Total education contribution = £2,508,684

Library Contribution

£60 per dwelling, so $£60 \times 600$ dwellings.

Total = £36,000

Highways Contribution

It should be noted that only rough figures have been received from the Highways department.

Public transport contributions for employment = £1m

Public transport contributions for housing = £1m+
(The developer will need to talk to the local bus operators for an accurate figure to be agreed)

Travel plan for employment (5 years) = Circa £200,000

Travel plan for housing = £279,000
(£465 per dwelling for 5 years)

Total = £2,479,000

Fire Hydrant Contribution

1 hydrant per 50 dwellings at £763 per hydrant:
 $£763 \times 12 = £9,156$

2 hydrants required for the commercial uses:
 $£763 \times 2 = £1,526$

Total = £10,682

However, it should be noted that the provision of fire hydrants would be accepted as a condition and as such will not be included in the final total.

Open Space Contribution

No open space contribution has been calculated as the application indicates that 20ha are proposed with this

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development. This is not broken down into what is publically accessible and what is not, but the plans show significant areas of publically accessible open space. A calculation has shown that around 3.5ha of open space would need to be provided on site or else contributed towards, and it is considered that this would be easily provided for on the site.

Total contribution required = £5,023,684

Total contribution proposed = £600,000

Total deficit = £4,423,684

Note: This excludes the fire hydrant contribution.

Attachment 3: Extract from the Greater Norwich Infrastructure Needs and Funding Study (October 2009)

G R E A T E R N O R W I C H I N F R A S T R U C T U R E N E E D S & F U N D I N G S T U D Y | 1 0

The key to a successful tariff model is that it is affordable and viable in the marketplace so as not to prevent development being brought forward. We have therefore undertaken a detailed analysis on the local property market and in the report we set out a few of the most salient points that will affect the setting of tariff policy and the potential income that can be derived from developer contributions. In setting the level of tariff, consideration needs to be given to the different market conditions within the region and we have identified a number of discernible sub-markets within Greater Norwich with different cost and value characteristics.

We have identified the cost of infrastructure for each of the growth locations and identified the cost of infrastructure by dwelling. This provides an understanding of the level of required developer contributions per dwelling required to bridge the funding gap.

Given the market context both geographically and over time we have carried out an assessment of the level of tariff that could be achieved based on current and strong market conditions across each of the residential market areas. In setting the charging schedule, consideration will need to be given to applying a variable rate of tariff, particularly for schemes that come forward in the short term, which would otherwise be unviable.

We undertook appraisals for each of the districts, with two sets of appraisals being carried out for South Norfolk for each of the housing market areas identified in this district. The appraisals were based on current sales values and values being achieved during the last peak in the housing market. Given the different nature of residential development within Norwich city in comparison with South Norfolk and Broadland i.e. higher density and predominantly flatted schemes, we applied different density and unit mix assumptions for Norwich City.

To provide an indication of the potential maximum tariff levels that could be applied to residential developments we have used a single hectare development model to assess viability.

Potential Tariff Requirements

* Within Norwich a tariff of £19,469 per dwelling would be needed if contributions from residential schemes are to bridge the funding gap identified. Although this could be achievable for an average sized scheme with housing grant, due to the individual nature of development sites within Norwich flexibility is needed to take into account site specific viability issues.

* Within Broadland the residential tariff required to fund the infrastructure needed for the Sprowston growth area is £28,600 significantly higher than for the rest of Broadland at £6,844. Whilst the tariff rate required for the rest of Broadland is achievable, the rate needed for the growth area is challenging and is likely to only be viable for agricultural sites with no alternative use value and where housing grant is available. This will still require landowners to agree to sell their land at significantly lower values in comparison to values that have been achieved previously.

* The residential tariff requirements for the South Norfolk strategic growth locations range from £10,992 in Cringleford to £61,071 in Wymondham. The detailed requirements by growth location are provided in Table 16-5. Given the range of funding gaps within these areas, the Norwich Housing Market area of South Norfolk and mid South Norfolk area residential schemes will generally only be able to achieve the tariff rate required to cover the funding gap in strong market conditions on agricultural sites with no alternative use value, and where housing grant is available. However this will require landowners to agree to sell their land at significantly lower values in comparison to those that have been achieved previously.

Attachment 4: Extract from the greater Norwich Development Partnership's Affordable Housing Viability Study (July 2010)

7 Benchmarking: Our Approach

7.1 Introduction

Assessing the propensity of each individual landowner within the Policy Area to sell their site is effectively impossible. There are an indeterminate number of variables and personal circumstances to consider, many of which could not be quantified or modelled as part of a 'high level' study such as this.

That said, a study such as this must, as stated in PPS3, "reflect an assessment of the likely economic viability of land for housing within the area". That is not to say that it must consider every conceivable site in the policy area, but the types of 'likely' sites. The accepted benchmark measure is the relationship between EUV and residual land value.

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Brownfield

For Brownfield sites, arriving at a benchmark is relatively straight forward. A recent planning case law decision (Berkeley Homes vs West Oxfordshire District Council) suggested that a reasonable uplift was considered to be 10%. There is little other guidance regarding the quantum of uplift from EUV. We have taken a prudent approach and assumed 15% as a reasonable uplift from each of the three Brownfield EUVs listed in Section 6.5.

Greenfield

The comparison with Greenfield sites is more complex. The EUV of, for example arable land, is typically low when compared to land with other uses. The uplift that the landowner would expect depends greatly on the perceived likelihood of gaining a planning consent for development. A key factor in determining this is whether or not the site is allocated (identified in a Regional or Local Plan as being earmarked for future development).

We propose to benchmark against three types of Greenfield land:

- Greenfield - unallocated
- Greenfield - allocated (lower value)
- Greenfield - allocated (higher value)

Unallocated Greenfield land may be bought speculatively for a developer's land bank. Such land can transact for between £10,000 and £200,000 per hectare, or around x1 to x15 of the Greenfield EUV in the previous section. The price tends to increase as the perceived chance of gaining consent increases. We propose to use the mid point, £100,000.

When a Greenfield site is allocated the market's perceived risk of gaining planning consent is reduced, but significant risk remain. The value of such sites can vary greatly due to a wide range of factors. We have sought to estimate two reasonable benchmark values. In doing this, we have had regard to a number of things, such as:

- current site availability;
- guideline/average published prices;
- the costs and risks involved in buying Greenfield land for residential development;
- residual appraisal analysis; and
- the value of unallocated Greenfield land.

The VOA's average land price for Norwich, as published in January 2010 was £1,700,000 per hectare, for "a Greenfield suburban site of 0.5 hectare, ripe for development with planning permission being available". The VOA state that their land prices are intended to be "illustrative rather than definitive", and in our view tend to be based on historical transactions. Greenfield sites currently available include a site for sale with planning consent in Sprowston. The site amounts to 1.7 Hectares and is available for £2,500,000 (£1,470,000 per hectare asking price) with residential consent.

We have sought to balance landowners' return with the risks associated with buying Greenfield land for residential development. These include, but are not limited to: planning risk; potential for unforeseen and abnormally high infrastructure costs; promotion costs; changeable timescales; political risk; and occasional reliance on other sites to deliver.

With this in mind, the benchmarks we have chosen are:

- Greenfield - allocated (lower value): £500,000 (30 times EUV)
- Greenfield - allocated (upper value): £750,000 (50 times EUV)

These measures are several multiples of EUV, and around a third to a half of the approximate value of Greenfield land with consent.

Summary

In summary, our benchmarks are:

Type of site	EUV	Reasonable Uplift	Benchmark
Brownfield - high	£1,500,000	15%	£1,725,000
Brownfield - mid	£1,000,000	15%	£1,150,000
Brownfield - low	£500,000	15%	£575,000
Greenfield - allocated, upper value	£15,000	x 50	£750,000
Greenfield - allocated, lower value	£15,000	x 33	£500,000
Greenfield - unallocated	£15,000	x 7	£100,000

Where our calculated residual land value is less than EUV, we have assumed it is not viable and if it is in excess of the Benchmark, we have deemed it viable. For land values between EUV and the Benchmark, we have classified them as marginal.

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Respondent: Landstock Estates Ltd & Landowners Group [8809] **Agent:** Barton Willmore (Mr Andrew Wilford) [8811]

Full Text:

Summary:

1.1. These representations are submitted on behalf of Landstock Estates Ltd and Landowners Group in response to the Greater Norwich Development Partnerships (GNDP) consultation on its 'Statement of Focussed Changes' (SoFC). It is our understanding that the SoFC has been specifically published to address what the GNDP considers are those issues that require further changes following the articulation by the Inspectors' of their concerns over the submitted Joint Core Strategy (JCS) before, during and after the Exploratory Meeting (EM) held on 13th May 2010.

1.2. The SoFC has been accompanied by two supporting documents, namely, a Sustainability Appraisal Report (July 2010) (SA) prepared by Scott Wilson and an Affordable Housing (AH) Viability Study (July 2010) prepared by Drivers Jonas Deloitte.

1.3. The SoFC only relates to 3 elements of the JCS. These are:

- * Provision of Gypsy and Traveller Pitches;
- * Affordable Housing; and,
- * The North East Norwich Strategic Allocation.

1.4. Representations have been made at every stage of the JCS process; and it is noted that this current consultation can only comment on soundness issues relating to the SoFC. We are mindful of this fact, but would like to remind the GNDP our ongoing soundness concerns relating to the submitted JCS as set out in our previous representations at the Issues and Options Stage, the Preferred Option Stage and the two Counsel's Opinions.

1.5. In summary, we conclude that the SoFC does not represent an adequate attempt by the GNDP to address the matter of particular concern raised at the EM on 13th May 2010 and as set out in the 15 page Note (EIP 35) circulated by the Inspectors, entitled 'Conclusion from the Exploratory Meeting' (dated 24th May 2010). EIP 35 set out that there were 6 areas of concern on which the Inspectors considered that further work was needed. These related to:

- i) Infrastructure;
- ii) Affordable Housing;
- iii) Distribution of Development, particularly in relation to public transport opportunities;
- iv) Northern Distributor Road;
- v) Sustainability Issues; and
- vi) The North-East Growth Triangle.

1.6. It is therefore surprising that the SoFC only relates to two of the six identified issues raised by the Inspectors. It is even more disappointing when the GNDP wrote to the Inspectors on 8th June 2010 (EIP 36) to clarify and note the Inspectors' concerns and set out the GNDP's suggested way forward on a number of these matters.

1.7. Notwithstanding our concerns regarding the additional matters upon which the GNDP has chosen not to respond, we set out below our comments on the focused changes, namely, those in relation to affordable housing and the proposed strategic allocation at NE Norwich, and the SA addendum and AH Viability Study that support the SoFC. Even in respect of these matters, alone, we contend that the JCS remains unsound.

- i) Section 5 - Stakeholder Event

3.1 The summary of the 'Stakeholder Event' is not reflective of the day's proceedings on 28th June 2010. The event was a presentation during which landowner representatives were highly critical of the methodology being explained. In the brief for the consultants one of the requirements was to conduct interviews with landowners. Our client is not aware that any detailed interviews were conducted with landowners and is disappointed that they were not asked to participate in a more meaningful way. PPS 12 (para 4.36) clearly requires strategies to be based on a robust evidence base which includes participation from those who have a stake in the future of the area. The stakeholder event did not meet this requirement.

3.2 One of the main issues raised by the Affordable Housing Assessor concerned what factors would incentivise landowners to sell land. To say that landowner incentivisation was discussed "at length" is a considerable over-statement. Rather, the general feeling of those present was that the methodology was unrealistic and in particular incentivisation was not understood by the consultants. The case of a standard 1ha site size was criticised as being unrealistic.

- ii) Section 6.1 - What is Viability?

3.3 This does not go far enough and does not address the criticism of the affordable housing assessor. It does not factor what influences landowners to act. Even where Existing Use Value (EUV) or Alternative Use Value (AUV) prices are

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exceeded by an offer, a landowner may well choose to wait and delivery of both market and affordable housing would not occur.

iii) Section 6.4 - Relevant Case Law

3.4 We have reviewed the Woodstock Case (Appendix A). The decision simply sets out an Inspector's finding that in that particular instance the inclusion of a 10% premium by the appellants (owners) to offset inconvenience and assist with relocation was not unreasonable in those circumstances.

3.5 It in no way implies that 10% is a benchmark suitable for any other case and it certainly does not imply that it is in any way a maximum that a landowner should accept as an incentive to sell. It is also not case law.

iv) Section 7.1 - Our Approach Introduction

3.6 We have a number of observations on the approach outlined in this section:

- * There is no evidence to indicate how the values for Greenfield allocated sites have been derived
- * The "accepted benchmark" should be the relationship between EUV and/or AUV taking account of factors which incentivise a landowner to sell, and residual land value
- * The choice of the three Greenfield benchmarks fails to understand how landowners operate
- * The benchmarks fail to include the scenario where an informed landowner understands his land may have prospects for development.
- * It is clear that if these benchmarks are adjusted the results of the model will be considerably different, resulting in a high number of unviable scenarios

v) Section 9 - Results

3.7 Chart 1 uses the word "significant" to describe the number of situations where the model indicates viability for 40% affordable housing. Another equally accurate way to describe Chart 1 would be to state that, "in under 1/3 of situations would 40% affordable housing be viable without grant". Equally it would be accurate to say that in 70% of the modelled scenarios viability was not shown with a 40% affordable housing target.

vi) Section 10 - Conclusions

3.8 Given the findings in Section 9 it is difficult to understand how the consultants have arrived at their recommendation that, "In our opinion a strategic policy wide target of 40% affordable housing is appropriate". Moreover, as pointed out above, selecting an appropriate target is not about any one single factor, whether need, viability or some other factor, it is about a consideration of several (para 29 PPS3). Given the results of this study and after giving consideration to housing need and other factors (see our comments above), a 40% strategic policy wide target has not been justified.

vi) Annex 1

2.19 Annex 1 sets out how the overall affordable housing target for JCS was calculated. As discussed above, we note it bases its calculations on the 2005/06 Housing Needs Assessment. We understand that based on the delivery of 1,306 affordable units between 2005/06 and 2007/08 that there is a residual requirement of 11,878 from 2008 to 2026. However, we disagree that: 'The policy target is higher, because the Government's basic needs assessment model make the assumption that any backlog at the time of the study is eliminated over the next five years. This therefore has the effect of increasing the affordable housing targets and in the particular the social rented element'.

2.20 Firstly, the overall shortfall in affordable housing in the housing needs assessment was calculated from adding the existing backlog at that time and the newly arising need, minus supply. This found 13,184 affordable housing units were required over the JCS plan period. Therefore, the 1,306 completed affordable units between 2005/06 to 2007/08 went towards reducing the overall affordable requirement.

2.21 Secondly, Table 2.0 breaks down the Affordable Housing Requirement for 2009-2026. This is based on the 2006 HNA and affordable housing completions between 2005/06 to 2008/09. Any of the original backlog remaining is still included in the total affordable housing requirement for 2009/10 to 2025/26. When looking at this as a percentage of total housing requirements, the required affordable housing is 33% for the whole GNDP area and therefore 40% is not justified by the evidence base.

Table 2.0 Affordable Housing Requirement for 2009-2026

Affordable Housing Requirement:
2006 - 2026
Backlog (ORS 05/06) 1,403
Newly arising need 2005/06-2025/2026 (21 x 561) (ORS 05/06) 11,781
Total 13,184
Minus Completions 2005/06 - 07/08 1,306

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Total AH Requirement 08/09 - 25/26 (18 years) 11,878
Minus Completions 2008/09 697
Total AH Requirement 09/10 - 25/26 (17 years) 11,181

Overall Housing Requirement 2008-2026 (set out in JCS) 35,660
Minus Completions 2008/09 1,745
Total housing Requirement 2009-2026 (17 years) 33,915

Percentage AH Requirement of Total Housing Requirement
(11,181 / 33,915) x 100 = 33%

2.22 The figure in the SoFC covers the period from 2008-2026 and does not take into account the completions from 2008/09. After looking at the available sites in the GN area, we have identified a potential 67 affordable units to be provided from sites of developments between 5 and 15 units. This was calculated from the list of potential sites provided in the SHLAA. Table 2.1 outlines that considering affordable housing commitments and completions to date, along with potential delivery from 5-15 unit sites, there is a remaining requirement of 7,385 affordable units from 2009-2026, to be sought from sites of 16+ units.

Table 2.1 Remaining Requirement of Affordable Units 2009 -2026

Total AH Requirement identified in Focussed Changes 11,860
Minus Existing Commitments 2008 (identified in Annex 1 of Focussed Changes) 3,711
Minus AH Completed 2008/09 697
Minus Potential supply 5-15 unit schemes 67
Remaining Requirement 7,385

5.1 Our view of the soundness of the JCS is well documented in previous representations and engagement at the EM on 13th May 2010. It is still clear that the matters of Affordable Housing and the Strategic Allocation remain unsound. There is no doubt that the short consultation on these issues has not repaired the position as outlined by the Inspectors. The real problem is that with a front loaded plan which has been developed over a number of years, it is impossible to play catch up on such significant issues.

5.2 The SoFC fails to address all the outstanding issues as set out by the Inspectors and has attempted to retro-fit the Sustainability Appraisal and JCS to suit the inclusion of the 'Strategic Allocation' and justification for the current level of Affordable Housing.

5.3 The JCS continues to be unsound, and the GNDDP have failed to adequately consult on the SA or undertaken the very basic necessity of scoping correctly to allow an updated SA to be undertaken.

Appendix A
Woodstock Appeal Decision

Appeal Decisions
Inquiry held on 6-9 October 2009 Site visit made on 9 October 2009
by John Braithwaite BSc(Arch)
BArch(Hons) RIBA MRTPI
an Inspector appointed by the Secretary of State Decision date:
for Communities and Local Government 18 November 2009

Appeal A1 Ref: APP/D3125/A/09/2104658 4 Oxford Street, Woodstock OX20 1TR
The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.

The appeal is made by Berkeley Homes (Oxford and Chiltern) Ltd against the decision of West Oxfordshire District Council.

The application Ref 08/1059/P/FP, dated 13 June 2008, was refused by notice dated 12 February 2009.
The development proposed is the demolition of Young's Garage and related outbuildings together with the rear extension to Nos. 6, 8 and 10 Oxford Street, the refurbishment of No. 6 Hensington Road and the construction of 30 dwellings, a health centre and a small shop together with associated vehicle parking, roads and pathways.

Appeal A2 Ref: APP/D3125/E/09/2104660 4 Oxford Street, Woodstock OX20 1TR

The appeal is made under section 20 of the Planning (Listed Buildings and Conservation Areas) Act 1990 against a refusal to grant listed building consent.

The appeal is made by Berkeley Homes (Oxford and Chiltern) Ltd against the decision of West Oxfordshire District Council.

The application Ref 08/1060/P/LB, dated 13 June 2008, was refused by notice dated 12 February 2009.

The works proposed are the demolition of sections of free-standing walls to rear yards, certain rear extensions and

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outbuildings to Nos. 6, 8 and 10 Oxford Street, together with the making good of the retained buildings and the construction of a new courtyard wall to No. 6.

Appeal A3 Ref: APP/D3125/E/09/2104663 4 Oxford Street, Woodstock OX20 1TR

The appeal is made under sections 20 and 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 against a refusal to grant conservation area consent.

The appeal is made by Berkeley Homes (Oxford and Chiltern) Ltd against the decision of West Oxfordshire District Council.

The application Ref 08/1061/P/DCA, dated 13 June 2008, was refused by notice dated 12 February 2009.

The proposal is for the demolition of Young's Garage and related outbuildings together with the rear extensions to Nos. 6, 8 and 10 Oxford Street, the refurbishment of No. 6 Hensington Road and the construction of 30 dwellings, a health centre and a small shop together with associated vehicle parking, roads and pathways.

Appeal B1 Ref: APP/D3125/A/09/2104669 4 Oxford Street, Woodstock OX20 1TR

The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.

The appeal is made by Berkeley Homes (Oxford and Chiltern) Ltd against the decision of West Oxfordshire District Council.

The application Ref 09/0201/P/FP, dated 16 February 2009, was refused by notice dated 28 April 2009.

The development proposed is the demolition of Young's Garage and related outbuildings together with the rear extension to Nos. 6, 8 and 10 Oxford Street and No. 6 Hensington Road, the construction of 36 dwellings, a B1 office building, a small shop and minor alterations to Punch Bowl Cottage.

Appeal B2 Ref: APP/D3125/E/09/2104672 4 Oxford Street, Woodstock OX20 1TR

The appeal is made under section 20 of the Planning (Listed Buildings and Conservation Areas) Act 1990 against a refusal to grant listed building consent.

The appeal is made by Berkeley Homes (Oxford and Chiltern) Ltd against the decision of West Oxfordshire District Council.

The application Ref 09/0202/P/LB, dated 16 February 2009, was refused by notice dated 28 April 2009.

The works proposed are demolition of Young's Garage and related outbuildings and No. 6 Hensington Road and rear extensions of 6, 8 and 10 Oxford Street, construction of 36 dwellings, B1 office building, shop and minor alterations to Punch Bowl Cottage.

Appeal B3 Ref: APP/D3125/E/09/2104675 4 Oxford Street, Woodstock OX20 1TR

The appeal is made under sections 20 and 74 of the Planning (Listed Buildings and Conservation Areas) Act 1990 against a refusal to grant conservation area consent.

The appeal is made by Berkeley Homes (Oxford and Chiltern) Ltd against the decision of West Oxfordshire District Council.

The application Ref 09/0203/P/DCA, dated 16 February 2009, was refused by notice dated 28 April 2009.

The proposal is for the demolition of Young's Garage and related outbuildings together with the rear extensions to Nos. 6, 8 and 10 Oxford Street and No. 6 Hensington Road, the construction of 36 dwellings, a B1 office building, a small shop and minor alterations to Punch Bowl Cottage.

Decision

1. The appeals are dismissed.

Procedural matters

2. The planning application that is the subject of Appeal A1 was amended, before consideration by the Council, to include the demolition of 6 Hensington Road, rather than its refurbishment, and the construction of 36 dwellings, rather than 30 dwellings. The description of the application is thus amended to be 'the demolition of Young's Garage and related outbuildings together with the rear extensions to Nos. 6, 8 and 10 Oxford Street and No. 6 Hensington Road, and the construction of 36 dwellings, a health centre and a small shop together with associated vehicle parking, roads and pathways'. Appeal A1 will be determined on this basis.

1 The Council considered the application for listed building consent (LBC) that is the subject of Appeal A2 to be 'Alteration to 6, 8 and 10 Oxford Street and 6 Hensington Road'. This is an accurate description except for the inclusion of 6 Hensington Road which is not a listed building and would be demolished as part of the overall redevelopment scheme. Appeal A2 will thus be determined on the basis that the application is for 'Alterations to 6, 8 and 10 Oxford Street'.

2 The Council considered the application for LBC that is the subject of Appeal B2 to be 'Alterations to 6, 8 and 10 Oxford Street'. This is an accurate description of the proposed works and Appeal B2 will be determined on this basis.

3 Conservation area consent (CAC) is only required for, given the judgement in the case of Shimizu (UK) Ltd v Westminster City Council [1997] JPL 523, the total or substantial demolition of an unlisted building in a conservation area. The Council therefore amended the description of the demolition in Appeals A3 and B3 to be 'Demolition of Young's Garage, related buildings and 6 Hensington Road'. However, 6 Hensington Road is not within a Conservation Area and Appeals A3 and B3 will thus be determined on the basis that the applications are for the 'Demolition of Young's Garage and related buildings'.

The appeal site and its surroundings

1 The virtually flat, roughly rectangular, appeal site is about 0.56 hectares. It has a south-west frontage to Oxford Street, north-west frontage to Hensington Road and a north-west boundary to The Punchbowl, a hotel on the corner of the junction of Oxford Street and Hensington Road. The site has a south-east boundary to New Road, partly a cul-de-sac

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residential road and partly a public footpath linking that road and Oxford Street, and a north-east boundary to a telephone exchange and 8 Hensington Road, a residential property. Along the northern half of the frontage to Oxford Street and alongside the pavement is a terrace of four Grade II listed buildings adjoining The Punchbowl, nos. 4-10 Oxford Street. Attached to the rear of nos. 6-10 are various extensions in various uses. The extensions to the rear of no. 6 are within the site but the original terraced building itself is outside the site.

2 The southern half of the south-west frontage is open and occupied by a second-hand car sales business that occupies the site of a former garage. Cars are displayed under the original forecourt canopy of the garage, within a modern glass sided building close to 4 Oxford Street and on hardstanding to the rear of the same building. Office accommodation for the car sales business is in a small part of the L-shaped, single storey, former Woodstock Railway Station building that is set back behind the forecourt canopy and close to the New Road footpath. The larger part of the station building and a model storage building that adjoins the station building are occupied by Midland Felt Roofing Ltd (MPR). This business also occupies open ground to the rear of the station building and an office building that is one of the rear extensions to the listed buildings.

3 Located to the rear of the car park to The Punchbowl is a modern two-storey dwelling, Punch Bowl Cottage, that has a gable end on the pavement to Hensington Road. To the north-west of the dwelling and set back from the road is 6 Hensington Road, a vacant, two storey, double fronted, brick built Victorian dwelling that has front, side and rear gardens. To the rear of this dwelling are two rows of garages and other buildings in a variety of storage uses. All of these are within the site.

4 Outside the site and on the opposite side of Hensington Road to no. 6 and Punch Bowl Cottage is traditional residential development on both sides of Union Street, and on the opposite side of the New Road footpath to the former station building is The Old School, a dwelling that occupies the buildings of the former Woodstock Church of England Primary School. The only currently used access into the site is off Oxford Street between the glass building and the forecourt canopy.

5 To the east of the site is mainly modern residential development and to the west is the town centre of Woodstock. At the heart of the town centre is the Town Hall at Market Place. Three streets, High Street, Market Street and Park Street, converge at Market Place and the majority of commercial and retail activity in the town is on these three streets. At the west end of Park Street are gates that mark one entry into the grounds that surround Blenheim Palace. The town centre is the centrepiece of Woodstock Conservation Area (WCA), which includes built development around the town centre including the terrace of listed buildings along the south-west frontage of the appeal site. About 60% of the site, the former station building, the land occupied by the car sales business, the extensions to the rear of the listed buildings and Punch Bowl Cottage, are also within the WCA. 6 Hensington Road and the rows of garages are outside the WCA.

The proposed developments - the subjects of Appeal A1 and Appeal B1

1 Both proposals are for the comprehensive redevelopment of the appeal site and both would include the relocation of the site access off Oxford Street to a point close to the New Road footpath. Both schemes would include the demolition of the former station building and related outbuildings, the rear extensions to 6, 8 and 10 Oxford Street, and 6 Hensington Road. Both schemes would include the construction of 36 dwellings in the same form and layout. Ten of the dwellings would be a terrace of units attached to the south-east gable of 4 Oxford Street and fronting onto the pavement to this street. The remaining twenty-six dwellings would be in two, three and four storey blocks to the rear of the existing and proposed frontage development. Both schemes would include a small ground floor shop in the proposed terraced unit adjoining 4 Oxford Street.

2 The proposals differ in the intended use of a three storey building that would be built between Punch Bowl Cottage and Hensington Road though the form, size, style and elevations of the alternative buildings would be similar. The Appeal A1 building would be a health centre whereas the Appeal B1 building would be a use class B1 office building (office building). Access to the building would be through the site from the relocated access off Oxford Street though an existing, gated, unused access off Hensington Road, between Punch Bowl Cottage and the proposed building, would be maintained for emergency purposes. The health centre would have a drop off lay-by on its Hensington Road frontage and both buildings would have undercroft parking for ten vehicles.

3 Woodstock has one doctors' surgery and the concept of the health centre is predicated on the relocation of that surgery to what would be a more central location in the town. The doctors' surgery had previously given an indication that they wished to relocate to the site but the necessary legal agreements have not been signed. The Appellants are hopeful that the doctors' surgery will relocate and have entered into a Section 106 Unilateral Undertaking to make land available for sale as a general practitioners' surgery or health-care centre for a period of three years after the commencement of development on the appeal site. This factor notwithstanding, the health centre is an integral element of the Appeal A1 scheme and the appeals will be determined on the basis that the health centre would be built if planning permission were to be granted for the redevelopment scheme A.

4 The application that is the subject of Appeal B1 and the associated applications for LBC and CAC were submitted after refusal by the Council of the applications for the Appeal A1 scheme. The Appellant has entered into a Section 106 Unilateral Undertaking to make the B1 office building site available for sale or lease for a period of three years after the commencement of development on the appeal site. It is therefore an integral element of the Appeal B1 scheme and the appeals will be determined on the basis that the office building would be built if planning permission were to be granted for the redevelopment scheme B.

The proposed works to the listed buildings - the subjects of Appeal A2 and Appeal B2

15. The proposed works to the four listed buildings on Oxford Street is the same in both cases. The various extensions to the rear of three of the buildings would be demolished and the rear elevations and yard areas of the four buildings would be remodelled. Neither the Council nor any third party has raised any significant concerns about the proposed works to the listed buildings and no reason has been found to conclude that the works would harm the special architectural and historical interest of the buildings. The Council accepted at the Inquiry, in both cases, that if planning permission were to be granted

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for the redevelopment scheme that there would be no impediment to the grant of LBC.

The proposed demolition of unlisted buildings in the WCA –the subjects of Appeal A3 and Appeal B3

16. The proposed demolition of unlisted buildings in the WCA is the same in both cases. The demolition of the glass side building, the forecourt canopy and the modern storage building attached to the former station building is not contentious. The demolition of the former station building concerns the Council and residents of Woodstock. However, the Council accepted at the Inquiry, in both cases, that if demolition of the station building was considered to be acceptable as part of redevelopment scheme, there would be no impediment to the grant of CAC.

The Development Plan

17. The Development Plan includes the West Oxfordshire Local Plan 2011 (LP), relevant policies of which have been saved under a direction dated 2 June 2009 made by the Secretary of State for Communities and Local Government.

The main issues in Appeal A1 and Appeal B1

18. The main issues are:

The effect of the demolition of the former station building on the character and appearance of the Woodstock Conservation Area;

The effect of the proposed development on the character and appearance and setting of the Woodstock Conservation Area and on the setting of listed buildings on Oxford Street;

The effect of the proposed development on the amenities of residents of 8 Hensington Road;

Whether the proposed development makes appropriate provision for affordable housing;

Whether the loss of an existing employment site would be outweighed by substantial planning benefits and would thus comply with LP policy E6.

Reasons

The demolition of the former station building

1 In 2008 English Heritage considered, for the second time, whether the station building was worthy of being included in the statutory list of buildings of special architectural and historic interest. The conclusion of the Advisor's Report was that "The former GWR station at Woodstock does not have the special interest required...to merit inclusion on the list". This does not, however, have a bearing on whether the building does, or does not, make a positive contribution to the character and appearance of the WCA. The Council, the Town Council and some local residents maintain that it does.

2 Both main parties and the Town Council have considered advice in English Heritage's publication 'Guidance on conservation area appraisals'. The guidance advises that "When considering the contribution made by unlisted buildings to the special architectural or historic interest of a conservation area, the following questions might be asked". It is worth considering these questions and the first is; "Is the building the work of a particular architect of regional or local note"? The architect of the building is not known and it is even possible that the building was a copy of a standard station pattern.

3 "Has the building qualities of age, style, materials or any other characteristics which reflect those of at least a substantial number of buildings in the conservation area"? There are other buildings of the Victorian era in the WCA but none of these are, given that the building is a standard station building, of the same style. The building is built in Cotswold stone as are most other buildings with any lengthy history in the area. The station building, in this regard, is not remarkable and does not have any characteristics that are noteworthy. It does not have any qualities that reflect those of a number of buildings in the WCA.

22. "Does the building relate by age, materials, or in any other historically significant way to adjacent listed buildings, and contribute positively to their

setting"? The listed buildings within the site and fronting Oxford Street are significantly older than the station building though, unsurprisingly, they are built in the same materials. The listed buildings do retain, in part, their original burgage plots but the station building does not intrude into these. The station building does not contribute positively to the history or setting of the listed buildings.

4 "Does the building serve as a reminder of the gradual development of the settlement in which it stands, or of an earlier phase of growth"? A branch line to Woodstock was first proposed in 1885 and the line and station were opened in 1890. This occurred partly on the initiative of the 8th Duke of Marlborough who promoted the new line as a means of passage for visitors to and from Blenheim Palace. The railway line provided train access from Woodstock to Oxford and beyond and, amongst other things, enabled the manufacturers of gloves in the Woodstock area to thrive by providing a means of transport for their goods.

5 After the Second World War the train service on the line declined. The line and station closed in 1954 and the line was lifted in 1958. There is no evidence of the line within the town and the station is the only reminder of Woodstock's previous connection to the country's rail network. The building does therefore serve as a reminder of the gradual development of the settlement but this conclusion could be directed at any building in the WCA. Furthermore, the history of the line has been documented and is the subject of a book by Stanley C Jenkins, 'The Woodstock Branch'. The history of the station building is well documented in writing and in photographs.

6 "Does the building have significant historic association with established features such as the road layout, burgage plots, town park or a landscape feature"? The station building was built where the railway line ended and it has no specific designed relationship to Oxford Street or to any other landscape features. In this regard, the original pattern of development in this part of the town was probably cleared away when the railway arrived and to make way for the construction of the station building.

7 "Does the building have landmark quality, or contribute to the quality of recognisable spaces, including exteriors or open spaces within a complex of public buildings"? The aforementioned book includes scale drawings of the station building that illustrate an unremarkable structure that was neither exceptional in design or decoration. It does not have any landmark quality, either in itself or through being positioned prominently in a scene or vista, and is not part of a complex of public buildings. It is worth considering here the relationship of the building to the street scene and to 'the quality of recognisable spaces'.

8 On the opposite side of Oxford Street to the station building is its junction with Rectory Lane. Roadside development

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either side of the junction is at oblique angles to Oxford Street and there is a triangular 'island' in between the two accesses into Rectory Lane off the main road. There is a degree of spaciousness here though, on the Rectory Lane side of Oxford Street, the space is clearly defined by built development. This space is in between the dense development of the town centre to the west and the relatively open space to the east between School House, even though this building adjoins the highway, and almshouses at Caroline Court. These buildings mark the traditional south-eastern extent of the town.

9 The transition between relatively open development and dense development in the town centre is undermined by the open space on the north-east side of Oxford Street between School House and no. 4, which is partly occupied by the station building. This building, given its scale and design and position set back from the road, provides no enclosure to the transition space. The building, in fact, is a 'weak' feature in townscape terms and in the street scene and, together with its forecourt area, undermines the quality of the recognisable space that is the junction between Oxford Street and Rectory Lane.

10 "Does the building reflect the traditional functional character of, or former use within, the area"? The building is a reminder of a past feature of the town, the branch railway line that supported former uses, and does reflect, to a degree, a former functional character. That former functional character is, however, undermined by the unsympathetic alterations that have been carried out to the building; in particular the reconfiguration of the original entry and exit doors to provide a large glazed shop front for the convenience store that was part of the former garage.

11 "Has the building significant historic association with local people or past events"? The aforementioned book records some personalities who have been associated with or who passed through the station building, including several Churchill and the 8th Duke of Marlborough had a part to play in its development. However, this aspect of the building is well documented and the building, in itself, bears no mark of any association with people or past events.

12 "Does the building's use contribute to the character or appearance of the Conservation Area"? The building's original use, given the degree of alteration to which the building has been subjected and the removal of the railway line, is no longer recognisable. The current car sales use of the building and its forecourt area detracts from the character and appearance of the WCA. The last question of the ten posed in the EH guidance document asks whether the building is associated with a designed landscape within the Conservation Area. It is not, and even in its original form it was not associated with a designed landscape.

13 The building does serve as a reminder of the gradual development of the settlement but this is well documented and is a comment that could be directed at any other building in the town. The building does have historic association with personalities of significance but, again, this is well documented and there is no mark on the building of this association. Furthermore, as indicated in the guidance, positive answers to one or more of the questions only 'could' provide the basis for considering that the building makes a positive contribution to the WCA. In this case there are only two partly positive answers and these are qualified by the degree to which the building and its history has been documented.

14 LP policy BE6 states that applications for the demolition of unlisted buildings in a Conservation Area will only be permitted if the structure to be demolished makes no positive contribution to the character and appearance of the area or the demolition forms part of redevelopment proposals that will positively enhance and improve the character and setting of the Conservation Area.

15 Taking all the aforementioned factors into account and all other matters mentioned by the Council, the Town Council and local residents, the former station

building makes little contribution to the Conservation Area. The demolition of the building, in itself, would not adversely affect, and would thus preserve, the character and appearance of the WCA. The proposed demolition would, therefore, comply with the first part of LP policy BE6. However, it is accepted that consent for demolition of a building that makes little contribution to a Conservation Area is dependant upon the grant of permission for the redevelopment of its site.

The Conservation Area and listed buildings on Oxford Street

1 The proposed development, in both cases, is a comprehensive scheme and the part of the development that would be outside the WCA, in terms of its effect on the WCA, cannot be separated from the part of the development that would be inside the WCA. In some respects the proposed scheme is commendable but in others it is not.

2 It has been suggested that the gable end of 4 Oxford Street, which is prominent in views along the street on entering the town from the south-east, marks the beginning of the town centre. This blank gable is not significant in townscape terms and does not mark the point where the town centre starts. This point is further west where there is a relatively narrow gap between the frontage of 6 Oxford Street and the angled corner of 11 Oxford Street and 50 High Street. Before this Oxford Street increases significantly in width towards its junction with Rectory Lane. As previously mentioned this transition space is undermined by the openness of the appeal site on the north-east side of the main road.

3 The terrace of units that would be attached to the south-east gable of 4 Oxford Street and that would front onto the pavement to this street would close the open aspect across the site and would reinforce the transition space. It would comprise three units. The central unit would be three storeys in height and the two outer units would be two storeys with attic dormers. The scale of the units is appropriate in this edge of town centre location and the units have been sensitively designed, particularly in terms of style and materials, to reflect the incremental form of terraced development that is one of the main characteristics of traditional development in the town.

4 The terraced units would be at an angle to the pavement which would widen out towards the proposed vehicular access into the site at its south corner. This widening of the pavement would provide the opportunity for trees to be planted within the pavement. Such planting is a feature of the town centre and would add to the mature planting that already exists opposite on the 'island' and in front of 1-11 Oxford Street. The access into the site would be, for its first part, alongside the New Road pedestrian footpath and these would be appropriately confined between the high wall to the garden around The Old School and the end gable of the new terrace. Development along the frontage to Oxford Street would enhance the transition space and the character and appearance of the WCA.

39. On the north-west side of the New Road footpath the station building would be replaced by a terrace of three, two storey plus attic, dwellings; units 28-30. The south-east elevation of the terrace would adjoin the footpath. The confinement of part of the footpath between this elevation and the garden wall to The Old School would be appropriate in

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townscape terms and windows in the elevation would provide some light at night and passive surveillance over the footpath. Behind the

terrace along the frontage to Oxford Street a narrow shared access would lead to a private 'rear courtyard' between the terraced listed buildings and a new terrace of dwellings, units 11–18, at the centre of the site. At ground level the rear courtyard would be a successful series of confined spaces overlooked from private amenity spaces. Original burgage plot boundary walls would be partly retained to define the spaces and to preserve the historic layout of plots in this part of the town.

5 Between the terrace of dwellings at the centre of the site and two terraces of dwellings with rear gardens alongside the north–east boundary of the site would be a 'central courtyard'. This courtyard would have parallel parking spaces on both sides and the site access road would pass through it to the health centre/office building at the north corner of the site. The south–east end of the central courtyard would be closed by units 29 and 30 and the north–west end would be closed by a pair of similar two storey plus attic dwellings, units 21 and 22. There would be no vehicular access through the site to Hensington Road but pedestrians would be able to use this route through the site. They would also be able to gain access through to New Road and this permeability of the site is another positive aspect of the redevelopment scheme.

6 A significant feature of development within the WCA is the difference in scale and form of frontage development to that behind. Frontage development on Oxford Street and on the three streets that converge at Market Place in the town centre is virtually all terraced in form and two and three storeys in height whereas development behind is less formal in form and significantly lower in height. These differences in scale and form contribute to the distinctive character of the WCA. These differences would not be replicated in the proposed redevelopment scheme. On the contrary, the new terrace in the middle of the site that would enclose the rear courtyard would be partly four storeys in height and, more significantly, would be higher than the frontage development it would be to the rear of.

7 Elevation 2 (Oxford Street Looking Northeast) on application drawing no. 0.333.PL105 is instructive in this regard. The elevation shows how residents of the new mid–terraced four storey dwellings would be able to look over the ridge of the new terraced unit that would be attached to 4 Oxford Street from their top storey outdoor terraces. It would, furthermore, be relatively formal in appearance compared to the traditional ad hoc form of backland development elsewhere in the WCA. Even further back in the site development on the north–east side of the main courtyard would be three storeys in height with attic rooms in steep pitched roofs. Elsewhere in the WCA development reduces in scale to the rear of frontage development but in the proposed scheme the scale of frontage development is continued across the site. The scale of development to the rear of existing and proposed frontage development on Oxford Street would be out of keeping with the character of the area. The existing frontage development comprises four listed buildings and the proposed redevelopment scheme, for the reasons set out above, would intrude into, and would thus not preserve, the setting of the listed buildings.

43. The other main criticism of the proposed scheme is the lack of visual permeability within the main courtyard and, consequently, the lack of any visual connection with traditional development in the WCA. Within the courtyard there would be virtually no views out and views within the courtyard would be almost wholly of modern 3 and 4 storey dwellings all of which would have first or second storey balconies on their frontages overlooking the courtyard. Such features are not found on dwelling frontages elsewhere in the WCA and, as a common feature, would be incongruous. The development, in itself, is not unattractive and the balconies and other design features have been sensitively incorporated into the overall scheme. It would, however, be on a site adjoining the town centre of a historic settlement which has a distinctive character and appearance. Given its form, scale, formal appearance and lack of visual permeability, the housing elements of the proposed redevelopment scheme would have a significant adverse effect on the character and appearance of the WCA.

8 The three storey health centre/office building would be uncompromisingly modern in design. It would have a flat roof that would be about 1.5 metres higher than the steep pitched gable roofs of 8 Hensington Road and Punch Bowl Cottage to either side. It would have distinctly horizontal proportions, it would terminate the vista along Union Street from the north–west, and it would be set close to the pavement to Hensington Road and, most importantly, in front of the building line of dwellings to the north–east. Again, whilst not unattractive in itself, it would dwarf nearby development, its proportions would be incongruous and it would be prominent in views along Union Street and along Hensington Road towards the town centre and the WCA. Though it would be situated outside the WCA the health centre/office building would harm the setting of the WCA.

9 LP policy BE5 requires that the character or appearance of a Conservation Area is not eroded by the introduction of unsympathetic development proposals either within or affecting the setting of the designated area and LP policy BE8 requires that development should not detract from the setting of a listed building.

10 The terraced frontage element on Oxford Street and the terraced dwellings alongside the New Road footpath would be sympathetic elements of the proposed redevelopment scheme. However, the bulk of the housing elements, given their scale and form in particular, and the health centre/office building, given its prominence and scale, would not be sympathetic. The redevelopment scheme, as a whole and in both cases, would adversely affect, and would thus not preserve, the character and appearance and setting of the WCA and the setting of listed buildings on Oxford Street. The proposed redevelopment schemes do not therefore comply with LP policies BE5 and BE8. The demolition of the former station building does not form part of redevelopment proposals that will positively enhance and improve the character and setting of the Conservation Area and its demolition does not therefore comply with the second part of LP policy BE6.

The amenities of residents of 8 Hensington Road

1 8 Hensington Road (the dwelling) is a semi–detached two storey dwelling with a south–west side elevation facing towards the appeal site and, specifically, towards the part of the site that would be occupied by the health centre or office building. The dwelling has a rear element that extends out from the main part of the building. The ground floor of this rear element is a dining room and patio doors provide access directly from this room to a paved area and also to the enclosed rear garden. In the side elevation of the dwelling is a ground floor kitchen window and a first floor bedroom window. Towards the rear of the dwelling and filling the gap between the dwelling and the high boundary wall to the appeal site is a garage. The area in front of the garage and outside the kitchen window is covered by a pergola that supports vegetation.

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2 The proposed flat roofed health centre/office building would be about 9.5 metres high overall. Its north-west elevation would extend about 4 metres beyond the rear element of the dwelling, and would extend beyond its front elevation. This elevation of the health centre would be built close to the boundary to the neighbouring residential property whereas the office building would be built about one metre from the boundary. This slight difference in location of the proposed building is not significant in assessing the effect of the proposed buildings on the amenities of neighbouring residents. For comparison purposes the dwelling has an eaves height of about 5 metres, an overall height of about 8 metres and the height of the ground floor kitchen window is about 2.5 metres above ground level.

3 The most used part of the rear garden at the dwelling will be the patio area immediately outside the dining room. The side elevation of the proposed health centre/office building would be no more than about 6 metres from the patio area. Given its height, proximity and position the proposed building would dominate the patio area and would have an overbearing effect on the rear garden. Given its height and orientation to the west of the patio and garden area the proposed building would overshadow the dwelling's private amenity area after about mid-afternoon throughout the year. This would be at the time of day when the patio area in particular is likely to be most in use. The proposed building would significantly reduce sunlight in, and would dominate, the rear private amenity area.

4 Currently, sunlight and daylight filters through vegetation supported by the pergola to the kitchen in the dwelling. The side elevation of the proposed building would be no more than about 4.5 metres from the kitchen window. Given its height, proximity and extent to both sides the proposed building would seriously reduce sunlight and daylight in the dwelling's kitchen. More importantly, given that it is a habitable room, the outlook from the first floor bedroom window would be of the proposed building's almost blank side elevation that would rise to about 4.5 metres above the window. Not only would the outlook from this window be bleak but the proposed building, given its proximity, height and orientation, would reduce sunlight and daylight in the first floor bedroom.

5 In the proposed health centre building there would be a first floor window to a community counselling room in the side elevation facing towards the dwelling. In the proposed office building there would be three narrow angled first floor windows to an open plan office area in the same side elevation. In both cases it would be reasonable and necessary to impose a condition to require the fitting and retention of opaque glass in the first floor windows facing towards the dwelling to alleviate any concern regarding overlooking. However, given its height, extent, orientation and proximity to the neighbouring residential property, the proposed building would result in a loss of sunlight and daylight both internally and externally at the dwelling. Furthermore, the construction of the building would result in a loss of outlook in one of the dwelling's bedrooms, and would dominate the patio area and would have an overbearing effect on its rear garden.

6 The proposed development, in both cases, would have a serious adverse effect on the amenities of residents of 8 Hensington Road. The proposed redevelopment schemes thus conflict with LP policy BE2, which states that proposals will only be permitted if, amongst other things, the proposal retains a satisfactory environment for people living in the area. To the harm that would be

caused to the amenities of neighbouring residents is sufficient reason, in itself, to dismiss the appeals and to refuse planning permission, in both cases.

Affordable housing

1 LP policy H11 relates to the provision of affordable housing and states that up to 50% affordable housing will be sought in a development such as that proposed. Detailed guidance on policy H11 is provided in a Supplementary Planning Document 'Affordable Housing' (SPD) that has been prepared in accordance with statutory requirements and that was formally adopted by the Council in April 2007. Paragraph 3.4 of the SPD advises that "Lower levels of provision (of affordable housing) on any site will be accepted where it is demonstrated that full provision would render a development unviable".

2 It is the Appellants' case that their proposed development would not be viable if any affordable housing were to be provided. They have, nevertheless, entered into a Unilateral Undertaking to provide five affordable flats. The Council, however, maintains that "Both the proposed schemes would be viable in providing 36% affordable housing, comprising 10 social rented units and 3 shared ownership units". The main parties agree on many of the costs incurred and values derived from building the proposed mixed use development. They disagree, however, on several main costs and values. The most significant of these are the existing use value of the land, the date of commencement of finance arrangements, the value derived from selling the market housing, the cost of building the residential elements of the development, and development profit.

3 The main parties' valuations of the current existing value of the land are not dissimilar but the Appellant has sought to add a 10% premium. Though the site is owned by the Appellants it must be assumed, for valuation purposes, that the land is being acquired now. It is unreasonable to assume that an existing owner and user of the land would not require a premium over the actual value of the land to offset inconvenience and assist with relocation. The Appellants' addition of the 10% premium is not unreasonable in these circumstances.

4 The Appellants have been actively pursuing the development of the land for about two years and it is likely that Agents were first instructed in the summer of 2007. The site is previously developed land in a sensitive location relative to listed buildings and the WCA, and has required the input of several professionals to provide the necessary information to support the applications and it is not surprising that two years have elapsed between first discussions on development of the site and the date of assessing the economic viability of providing an element of affordable housing. It is unrealistic, therefore, for the Council to allow for finance arrangements from only three months before potential commencement on site and not unreasonable for the Appellants to allow for finance arrangements from the date of purchase of the site.

57. The Council's witness does not live in the area and consulted only one local estate agent on the current housing market. The list of properties he assessed to establish an average private residential receipt included properties sold as far back as February 2003 and included only three properties sold in 2008-9. He sought to assert, also, that Woodstock has its own microclimate in terms of property values and that new build properties attract a premium. There is no evidence to support

these assertions. On the contrary, a property in a modern development on the outskirts of Woodstock sold in 2007 for

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about £3500 per square metre whereas its similar neighbour sold in May 2008 for about £2900 per square metre; a fall of about 17%, which suggests that there has been a downturn in the local housing market. Furthermore, only one property referred to by the Council's witness has sold for more than his estimated average private residential receipt and this was: individual, high specification, detached dwelling with its own private garden; not in any way comparable to dwellings proposed on the appeal site.

5 The Appellant's witness on this subject does live in the area and has consulted several local estate agents and his own company's new homes department. He considered properties sold no further back than April 2008 and made adjustments for comparability and the movement in the market since the date of each transaction. He also gave careful consideration to the detailed layout and orientation of the site when attributing a potential value to each of the proposed dwellings. His evidence was more credible than that provided by the Council's witness and his estimate of the average private residential receipt for the private dwellings, just over £3000 per square metre, is reasonable.

6 The Council's witness has used BCIS data, albeit from the upper quartile range to reflect the quality of the Appellant's developments, to estimate the build cost of the proposed development. This is a somewhat arbitrary method. The Appellant's witness had the benefit of the Appellants' estimated costs of building the actual proposed development on the appeal site. This evidence was not challenged at the Inquiry and has been used to estimate the overall build cost. There is no evidence to suggest that the build cost has been inflated in any way and it is worth noting that other unchallenged evidence indicates that the estimated build cost per square metre would be less than that of two other recent similar developments built by the Appellants. Again, the Appellants' witness's evidence is credible on this matter and his build cost estimates are reasonable.

7 The Appellants' witness's estimates of the value of the land, the revenue that would be derived from the development, and of finance and build costs, are reasonable. Evidence produced by the Appellant's witness at the Inquiry, which was not challenged, applied his reasonable estimates to the Council witness's other figures; which are based on the provision of 36% affordable housing. Applying all of the estimates would result in the Appellants incurring a deficit of about 2.1%. On this basis the development would not be viable. From the same evidence and 'splitting the difference' on build cost but with no affordable housing the Appellants would achieve a profit of about 16.5%. This would be less than the 17% profit which the Council's witness asserts "...would make the development viable". The witnesses disagree on what would be an acceptable profit but, given that even with no affordable housing the development would provide less than the lowest suggested acceptable profit, there is no reason to reach a conclusion on this matter.

8 From all the evidence provided it is likely that any provision of affordable housing would result in the redevelopment schemes being less than viable. The Appellants' Unilateral Undertaking to provide five affordable flats is therefore considered to make appropriate provision for affordable housing. The SPD indicates that viability of a particular scheme influences the level of provision of affordable housing. Taking the specific circumstances of the site and the development into account, the proposed redevelopment schemes do not conflict with LP policy H11.

Employment land

1 LP policy E6 states that the change of use of existing premises and sites with an established employment use to non-employment uses will not be allowed unless, setting aside two other possibilities for compliance with the policy, substantial planning benefits would be achieved by allowing alternative forms of development.

2 The appeal site is in established employment use even though MPR are carrying forward relocation to another site because a temporary planning permission for their use of part of the site has expired. The Appellants accept, in any event that the redevelopment proposals for the site must comply with LP policy E6. In this regard they maintain that the proposals would achieve substantial planning benefits and would therefore comply with the policy. They suggest that the proposed redevelopment scheme would, amongst other things, benefit the townscape of Woodstock, the fabric and setting of listed buildings and the WCA, the provision of affordable housing, and highway matters.

3 Whilst the proposed frontage development on Oxford Street would benefit the townscape of Woodstock, as would the removal of the majority of buildings on the site, the proposed redevelopment scheme as a whole would not. Nor would it benefit the setting of listed buildings on Oxford Street or the WCA, and the absence of harm to the fabric of the listed buildings cannot be regarded to be a substantial planning benefit. If the appeal site was not in employment use the housing element of a redevelopment scheme would still be required to comply with policy H11 and to include, if viable, a proportion of affordable housing. The provision of affordable housing as part of the proposed redevelopment scheme cannot therefore be regarded to be a substantial planning benefit.

4 Visibility for drivers of vehicles exiting the site at the existing access onto Oxford Street is sub-standard to the north-west whilst visibility at the proposed access would meet current standards in both directions. The suitability of the proposed access is only relevant to consideration of the proposed redevelopment schemes and the fact that it would have adequate visibility splays cannot be regarded to be a planning benefit. Furthermore, the proposed access could only be provided if the station building were to be removed and this would not occur unless a redevelopment scheme for the site is acceptable. There are no highway matters that can be considered to be substantial planning benefits.

5 The Council has prepared and published a Strategic Housing Land Availability Assessment (SHLAA), which identifies sites with the potential for housing to meet the future housing needs of the District. The appeal site is identified in the SHLAA and "...is considered suitable for a mixed use development, including housing". The SHLAA is an Interim Report and has been prepared only to inform future decisions on where housing could be located but it does provide an indication of whether sites are being considered as suitable for housing. Furthermore, the SHLAA does provide an indication that the site is likely to be developed in the future for a mixed use, including housing. It is in recognition of this limitation that the Appellants have proposed a mixed use scheme for the site.

67. The health centre or office building has therefore been included in the redevelopment scheme to satisfy a Council commitment, if that is what is suggested in the SHLAA, to seek a mixed use of the site rather than a wholly housing use.

This does not constitute local planning policy but Council Officers have clearly maintained such a commitment in pre-application discussions and this commitment is likely to be carried forward into the future. Either proposed use for the north corner of the site would create employment opportunities but this would offset the loss of the whole site for

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employment and, given the SHLAA 'commitment' for the future of the site, must therefore be regarded to be a planning requirement for the redevelopment of the site, rather than a planning benefit.

6 This conclusion is made, to a degree, because the local doctor's surgery has not committed to relocation to a health centre at the north corner of the appeal site, and because the alternative office building is speculative. The Appellants have made a commitment, by entering into Unilateral Undertakings to provide for either of these employment opportunities for a period of three years after, and if, planning permission is granted for either or both of the planning appeals. If, after that three year period, neither possible employment opportunity has been realised, there would inevitably be pressure on the Council to permit alternative housing use.

7 If this were to occur the site would, potentially, be in a wholly housing use, apart from the shop unit on the Oxford Street frontage. This factor reiterates the previous conclusion that both employment opportunities on part of the site are planning requirements rather than planning benefits. There is no evidence to indicate that substantial planning benefits would be achieved by allowing either alternative form of development of the appeal site that has an established empl

Focussed changes: Affordable Housing Study

O - 12304 - 8500 - Affordable Housing Study - i, i

12304 Object

Affordable Housing Study

Affordable Housing Study

Respondent: Mr Hugh Ivins [8500]

Agent: N/A

Full Text:

Summary:

Affordable Housing (Viability) Study

Para 2.1- Density the range from 30 uph upwards does not take account of the lower densities which are prevalent in the Broadland District such as the rural villages and conservation areas where 20 - 25 uph are imposed despite their commercial at para 8.3. The same paragraph refers to South Norfolk's policy of 27 uph in rural areas. Para 9.3 Key Findings - Variance across Local Authority areas, while the study indicates that viability remains fairly consistent over the 3 areas with a 40% affordable target, Annexe 1 of the Statement of Focussed changes, page 30, indicates the significant variance regarding the delivery of affordable housing between Norwich and the two other Districts

Focussed changes: Affordable Housing Study

S - 12307 - 8815 - Affordable Housing Study - Non

12307 Support

Affordable Housing Study

Affordable Housing Study

Respondent: NHS Norfolk (Mr David Stonehouse) [8815]

Agent: N/A

Full Text:

Summary:

While NHS Norfolk does not question the legality or soundness of the decision to be more flexible on the proportion of affordable homes, we are concerned to see that this remains as high a priority as possible. Providing affordable homes improves health outcomes allowing families on lower incomes to spend limited resources on healthy food, heating fuel in winter in addition to also providing stability and improved psychological wellbeing. Affordable homes can also provide opportunities for independent living for young or vulnerable people thereby having positive impact on their health benefits.