

Greater Norwich Development Partnership

Matter 3a Strategy and locations for major growth in the NPA (policies 9 and 10, and Appendix 5), including consideration of related access & transportation issues (policy 6) and other infrastructure issues

Note: EIP93 sets out the minor changes to the text of JCS1 to address revocation of the Regional Spatial Strategy.

Part A- Overall distribution of growth

A1 Are the absolute and comparative quantities of growth distributed to the main locations the most appropriate and are they founded on a robust and credible evidence base?

1. The absolute level of housing growth within the strategy area following the revocation of the RSS is discussed in the topic paper EIP70 submitted in response to the request by the inspectors (EIP63)
2. The absolute quantity of land needed for employment purposes, and guidance on strategic distribution, is derived from the Greater Norwich Employment Growth and Sites and Premises study (EC3)
3. The absolute quantity of land required for retail purposes, and guidance on strategic distribution, is derived from the Retail and Town Centres study (EC4). In this instance, because of the effects of the recession, a cautious view was taken regarding levels of potential growth based on more buoyant economic times
4. The share assigned to the NPA was originally derived from the RSS, but is still considered valid in the light of the advice in PPS3 (particularly paragraphs 10, 11, and 36–39; PPG 13 paragraph 13, section 2 and paragraph 19). It also remains valid in light of the findings of the Greater Norwich Housing Market Assessment 2007 (H2) on the distribution of housing need, and in terms of access to major employment areas.
5. The rationale behind the broad distribution of housing growth within the NPA is set out in the Topic Paper “Strategy to Accommodate Major Housing Growth in the Norwich Policy Area” (TP8), updated in EIP 86.
6. The consideration of the main growth locations is clarified in EIP 86. This covers the derivation of the growth strategy Favoured

Option in the Norwich Policy Area (NPA) and its relationship to public transport opportunities, and clarifies the growth options with references to the considerations of the evidence base.

7. The distribution takes account of responses to the Issues and Options public consultation on 12 potential major growth locations, the Regulation 25 Technical Consultation on 3 major growth options and the Regulation 25 Public Consultation on the Favoured Option (which also referred to the three preceding growth options).
8. The distribution was also influenced by responses to the above consultations regarding the JCS Vision and Objectives which referred to the distribution of growth and the development of sustainable communities, plus the consideration of the Sustainability Appraisals, the conclusions drawn from the wide range of research and studies listed in the JCS Appendix 2 (and TP8, Appendix 5) and GNDP partner local authority Member wishes.
9. The comparative quantities of growth reflect the need to provide for a range of sizes and types of sustainable communities in settlements with good access to services, facilities and strategic employment locations, while providing for in particular the needs of Norwich as a major regional centre. The levels of growth provided for reflect the form and character of settlements, having regard to local servicing, infrastructure provision, environmental, housing marketing and economic growth considerations, while reflecting government guidance to concentrate development to enable good accessibility by sustainable means of transport.
10. The distribution of growth in the main locations takes account of competing factors and is considered to be the most appropriate.

A2 Is this pattern of development deliverable in infrastructure and market terms?

1. The wide range of locations and scales of growth maximises market delivery and minimises the impact of any unforeseen delays in infrastructure delivery. Information on the potential delivery of housing growth in the Norwich Policy Area is shown in Topic Paper Ref: TP8, Chapter 7.3 "Future delivery".
2. The Housing Trajectory shown in the JCS Appendix 6 demonstrates that the housing provision of the JCS can be delivered within the appropriate timescale.
3. The critical strategic infrastructure has been identified by a range of studies supporting the JCS. This is reflected by the revised JCS Appendix 7: Implementation Framework (EIP 84).

4. The GNDP partners are fully committed to developing and managing an infrastructure delivery programme through the Local Investment Plan and Programme (LIPP), which is a draft, and will remain a regularly updated working document (EIP 85).
5. Service providers have been engaged in the production of the JCS and discussions are ongoing with them to deliver the JCS.
6. Updated position statements with regard to water supply and waste water disposal issues will be submitted in advance of the Hearings by Anglian Water, the Environment Agency and Natural England.
7. In market terms, the distribution of housing development provides for the varying housing market areas identified by background evidence in the Greater Norwich Housing Market Assessment (H2) and provides for a variety of scales of development and a spread of locations conveniently situated with good access to essential services and facilities to provide for flexibility in meeting housing market demands.
8. The JCS concentrates significant amounts of development in larger growth locations, which enables more comprehensive access to public transport and sustainable modes to be delivered. There is a reliance on commercial operation of services to new sites. The JCS distribution allows bus operators to better serve new development within existing transport networks on a commercial basis at a lower financial risk. Disaggregated and dispersed growth would lead to the risk of infrastructure requirements for buses, walking and cycling not being delivered in a co-ordinated fashion creating broken networks that do not encourage their use. Detailed planning for public transport requirements will follow when exact locations are known, as this will fundamentally influence what transport provision can be provided.
9. The scale and location of development takes advantage of existing public transport corridors and the scale of growth provides additional market to continue to improve public transport services. EIP88 examines the growth locations and provides an analysis of the existing public transport provision on the main corridors that serve the planned growth (A1074, A11, A140 and North East). It also sets out an assessment of growth, local constraints and expected levels of public transport service for each corridor.
10. The assessment of the new and existing distributions of growth demonstrates that the pattern of development is deliverable in market terms.
11. To support and enhance public transport services, enhancements have been identified for the main corridors. These are set out in

EIP88 section 5. The public transport interventions can be delivered as incremental schemes phased to match the progress of development of the growth locations. Appendixes A to F of EIP 88 indicate how service levels will be enhanced to match growth.

12. The NATS Implementation Plan as shown in the NATS report to County Council (EIP 9 and EIP 10) is well suited to a phased approach to delivery and builds on the significant success of NATS to date, which has an excellent track record of delivering a wide range of infrastructure to aid modal shift. The NATS Implementation Plan is a series of linked schemes that will be coordinated to maximise benefits. In addition to physical bus priority measures, there are other important factors that will encourage modal shift from car to bus. These include new bus shelters, high quality and up-to-date travel information, high quality vehicles (provided by operators) and improved ticketing arrangements. These measures can be delivered flexibly and corridors can benefit from these schemes in advance of bus priority measures. Works are progressing to deliver these measures now.
13. The supplementary paper “Norwich Area Transportation Strategy Implementation Plan – Report in response to Inspectors’ Comments following the Exploratory Meeting” EIP88 refers to the enhancements of public transport, walking and cycling provisions to meet the needs of the proposed pattern of development, as summarised also in Section 5 of the response to the Planning Inspectors’ Requirement No. 3) arising from the Exploratory Meeting of 13 May 2010 (EIP 86 regarding the distribution of growth and the development of public transport opportunities.

A3 What flexibility exists within the overall strategy to accelerate/defer development in particular locations if circumstances make this necessary? Is the JCS sufficiently clear on this point and how such flexibility would be achieved?

1. The wide ranging distribution of growth locations at different scales provides flexibility
2. Flexibility in the provision of housing development is demonstrated by JCS Appendix 6 housing trajectories for the growth locations. These demonstrate that potential delays in the start of development in some locations could be offset by earlier starts elsewhere.
3. JCS Policy 9 (second paragraph) requires the allocation of land to provide for minimum levels of housing growth in the Norwich Policy Area which will provide for additional flexibility in the provision of sites and their delivery.

4. JCS Policy 2 provides for the master planning of defined major development areas and areas of particular complexity to reduce developer uncertainty and encourage their development.
5. The draft Local Investment Plan and Programme (LIPP) (EIP 85) complements the JCS by clarifying the funding required for and timing of the required infrastructure to reduce developer uncertainty

A4 What is meant in practice by para 6.17 (under the heading 'key dependencies') *'There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth'*. Does the JCS clearly identify such key dependencies in respect of each growth location, or effectively identify the mechanism(s) through which such dependencies will be identified?

1. Different degrees of key infrastructure have been identified and related to their criticality in relation to the development of the major growth areas.
2. A revised version of JCS Appendix 7 "Implementation Framework" clarifies the requirements for and provision of key infrastructure in response to this issue (EIP 84) as expanded by the draft LIPP (EIP 85).

A5 Is the aim of the 3rd bullet point of policy 9 to convey the objective of 'integrating well with neighbouring areas while also contributing to a higher level of self containment for the host town/community'?

1. This Inspector's matter appears to relate to Policy 10, 3rd bullet point, which refers to a "high" level of self containment.
2. This bullet point was intended to apply in general to a range of different types of growth areas and was intended to convey the need for a balance between self-containment and integration.

A6 To demonstrate compatibility with the Community Infrastructure Levy Regulations 2010, should the second sentence of policy 10 read something to the effect that "Development will achieve the highest standards of design and provide for the necessary infrastructure and services which it generates in accordance with the Community Infrastructure Levy Regulations 2010. Some of these improvements may bring knock-on improvements to existing communities."

1. Such an amendment is not considered to be necessary because the

provision of infrastructure may be addressed by funding from a variety of sources and not only by the Community Infrastructure Levy (CIL) (or a development tariff).