

GNDP response to the Inspectors' requirements arising from the Joint Core Strategy (JCS) Exploratory Meeting (EM) of 13 May 2010

EM conclusions Issue 3): The distribution of development, in particular in relation to public transport opportunities

1. Introduction

1.1 The Inspectors have identified further work to be completed by the GNDP in response to further issues raised in relation to the JCS Exploratory Meeting of 13/5/10. These included concerns about the justification for the distribution of development proposed and its ability to provide for improved public transport and a major shift towards public transport use. The Inspectors' requirements and the scope of the GNDP responses are summarised below, followed by the GNDP responses in detail.

1.2 The Inspectors' requirements:

- 1.2.1 A clear evidence-based explanation and audit trail for Option 2A – why was it the most appropriate strategy compared to reasonable alternatives? Why was it chosen contrary to the SA (ref: EIP14(1)) conclusions?
- 1.2.2 Clearer evidence about the nature and level of JCS proposed public transport improvements, their viability, deliverability and timescales – Does the development distribution provide for improvements (including turn-up-and-go services) in a reasonable time rather than become long term aspirations with little effect on short-medium term travel patterns?
- 1.2.3 Sufficiently challenging modal shift targets. (i.e. would the evidence conclude that the growth distribution could support and promote a culture change from car reliance to sustainable transport?)

2. The GNDP response

2.1 The following response includes information that was agreed to be provided by the GNDP following the JCS Exploratory Meeting of 13/5/10 and comprises:

Section 3

- The derivation of the JCS Norwich Policy Area (NPA) growth distribution and its justification with references to an appended summary diagram of the process and an appended detailed audit trail. (Appendices 1,2 and 3).
- A revised Section 6, "Evolution of the Favoured Option", of the topic paper ref. TP8, "Strategy to Accommodate Major Housing Growth in the Norwich Policy Area". This describes the sequence of decisions leading to the Favoured Option and concludes with a summary of its links with Option 1 (the original draft Preferred Option) and Option 2, the two best options supported by a combination of evidence and sustainability appraisal (Appendix 4).

Section 4

- A commentary on the Sustainability Appraisal (SA) conclusions and the mitigations required to overcome concerns raised by the SA conclusions on iterations of the growth strategy as set out in the table in Appendix 5.
- An approach to growth in Long Stratton is provided for as a paper showing the basis for the development of an evidence-based “vision” for the development of Long Stratton as a more self contained development location in response to the SA conclusions, and based on evidence supporting its potential for self containment (Appendix 6)

Section 5

- Responses to the Inspectors’ requirements in paragraphs 1.2.2. and 1.2.3 above regarding the associated public transport improvements and modal shift targets, including responses to detailed issues also raised by the Inspectors’ conclusions from the EM relating to the delivery and viability of Bus Rapid Transit (BRT) in the A11 corridor and the potential to provide for “turn-up-and-go” bus services to growth areas in South Norfolk including reference to the provision of enhanced bus services to Long Stratton. (See supplementary paper titled, “Norwich Area Transportation Strategy Implementation Plan: report in response to Inspectors’ comments following the Exploratory Meeting”).

3. The derivation of the distribution of development provisions in the Favoured Option (Option 2+): a clarified audit trail

- 3.1 The Inspectors’ requirement for an evidence-based audit trail for the derivation of Option 2A has assumed that it was effectively the same as the subsequent Favoured Option (i.e. Option 2+), which was the NPA growth strategy in the submission version JCS. However the Favoured Option and Option 2A have separate roots to their preparation which should be understood at the outset.
- 3.2 Option 2A was a derivative of Options 2 and 3, whereas the Favoured Option (Option 2+) was a derivative of Options 1 and 2. It should also be noted that the overall numbers of dwellings to be provided significantly differed between the options developed and finally favoured. Options 1, 2 and 3 provided for totals of 24,000 new dwellings, whereas Option 2A provided for 23000 dwellings (including 2000 providing for a new settlement at Mangreen), while Option 2+ (the Favoured Option) provided for 21000 new dwellings. Options 2A and 2+ both followed a review of house completions and an update to the base date of the strategy and thus provided for lower housing provisions to 2026 in the NPA.
- 3.3 This response therefore demonstrates the derivation of the Favoured Option from Options 1 and 2. (An **audit trail** summary diagram leading to the choice of the Favoured Option is shown in **Appendix 1**).
- 3.4 A more detailed sequence of events showing the considerations of particular meetings of GNDP Policy Groups and LDF Working Groups, the decisions

taken regarding the development of the growth options, and specific references to where information can be found that informed Members' considerations is shown in **Appendix 2**. The references include the responses to the technical and public consultations, the steadily increasing background evidence, and the outcomes of the iterative Sustainability Appraisal process. Particular reference should also be made to the detailed evidence-based derivation of Option 2+ as considered and agreed by the GNDP Policy Group on 19th February 2009, as shown in **Appendix 3**.

- 3.5 The audit trail details the process followed from the Issues and Options stage to Option 1 (the original "Preferred Option"), Options 1-3 forming the basis for the Regulation 25 technical consultation, Option 2A which was agreed to be taken forward subject to the outcome of an independent review by a Planning Inspector, and Option 2+ (i.e. the resulting Favoured Option). The latter option was developed and taken forward as the basis of the Regulation 25 public consultation following the independent Planning Inspector's review, and became the basis for the NPA growth strategy in the submitted JCS
- 3.6 The development of the options has been clarified in revisions to Chapter 6 ("Evolution of the Favoured Option") of the topic paper Ref: TP8, "Strategy to Accommodate Major Housing growth in the Norwich Policy Area". These revisions are attached as **Appendix 4**.
- 3.7 Topic Paper Ref: TP8 (in its Appendices 1, 2 and 3) also summarises the contexts for the choices of the locations for, and the types of, the proposed major growth areas in the NPA, with references to environmental, infrastructure, services and facilities considerations. The conclusions to these sections explain and support the proposed housing provisions for Norwich, the provisions for most growth in the northern part of the NPA to be in the form of an urban extension, and the spread of provisions for growth in the southern part of the NPA.
- 3.8 With regard to the derivation of the Favoured Option, Option 1 and Option 2, which was similar to Option 1 and received a good SA result, continued to receive a favourable consideration in the development of alternative options until a late stage in the growth option development process. The relationships between Options 1, 2 and The Favoured Option (i.e. Option 2+) as summarised in Topic Paper Ref: TP8, with reference also to the Favoured Option's replacement of Option 2A, should be read alongside the comments made in Section 4 below about the results of the sustainability appraisals.
- 3.9 Major decisions regarding the choices and evolution of growth options and the consideration of the evidence base were made at **key meetings of the GNDP Policy Groups and LDF Working Groups** as shown on the audit trail summary diagram in Appendix 1. These meetings (see Appendices 1 and 2) were the:
- 22nd January 2008 GNDP Policy Group/ LDF Working Group
 - 21st April 2008 GNDP Policy Group/ LDF Working Group
 - 14th May 2008 GNDP Policy Group/ LDF Working Group
 - 24th June 2008 GNDP Policy Group
 - 18th December 2008 GNDP Policy Group

- 19th February 2010 GNDP Policy Group
- 3.10 The considerations of the evidence that supported a shortlist of four potential major growth locations the draft Preferred Option was considered by Members of the **GNDP Policy Group/ LDF Working Group on the 22nd January 2008**. Members considered the preliminary results of the SA, and the outcomes to date of the major evidence studies. To date these had covered infrastructure needs and funding, employment growth, sites and premises, the assessment of strategic flood risk, the water cycle study Stage 1, the requirements for green infrastructure, the potential for retail and leisure development in town centres and a housing market assessment (see JCS Appendix 2).
- 3.11 The **21st April 2008 GNDP Policy Group/ LDF Working Group** considered an initial draft of the JCS, an initial draft Preferred Option for growth in the NPA (which later became Option 1), the results of the Issues and Options consultation, the SA, the RSS (since revoked) and information derived from the evidence studies from which conclusions were drawn in support of the draft Preferred Option. This provided for three large and one medium scale growth locations in the NPA (see revised topic paper extract from TP 8 in Appendix 4). Members concluded however that further options were required.
- 3.12 The **14th May 2008 GNDP Policy Group/ LDF Working Group** considered five potential alternative growth options to Option 1, a detailed justification for the draft Preferred Option, the interdependencies between growth and the required infrastructure, and the justification for the sizes and distribution of the proposed development. Members also considered broad assessments of the additional options compared to the consultation responses and an internal “sustainability test” (i.e. this was not a full SA). These were consequently reduced to three reasonable options overall, to which a further option was added and one removed following a further internal “sustainability test” by GNDP officers
- 3.13 The resulting Options 1-3 were considered by Members at the **24th June 2008 GNDP Policy Group** and agreed as a basis for a Regulation 25 consultation with specific bodies (i.e. the Reg. 25 Technical Consultation). This was because the Planning regulations were about to change and the strategy development process to date had been insufficiently advanced under the previous Planning Regulations to allow the GNDP to proceed with a Preferred Options consultation. The evidence base considered included the growth locations SA summary scores table and detailed assessment tables showing the deliverability of the options. The latter tables included information on the growth options synergies and conflicts, plus location-specific constraints, opportunities, comments and infrastructure requirements.
- 3.14 **The 18th December 2008 GNDP Policy Group** Members considered additional Option 2A as tabled by South Norfolk Council, alongside an Evidence Report which included an analysis of Options 1-3, a summary of the results of the Regulation 25 technical consultation and the conclusions from the independently reviewed SA of Options 1-3. Having been advised of

the evidence supporting Option 1 and being requested to agree a single favoured option for potential full public consultation, Members were also informed of the advantages and disadvantages of Option 2A. While this raised sufficient Member concerns to prompt a request for its independent review by a Planning Inspector, Members resolved to agree Option 2A as the single favoured option to go forward, subject to the results of the review (subsequently carried out during January/February 2009).

- 3.15 In view of the Planning Inspector's concerns raised regarding Option 2A, Option 2+ was proposed as a replacement option in the spirit of Option 2A, but was considered to have a closer relationship to the available evidence that had supported Options 1 and 2. This option was considered with its supporting evidence base by Members at the **GNDP Policy Group of the 19th February 2009**. The Option 2+ evidence base is shown in Appendix 3.

Summary

- 3.16 Overall the Favoured Option (Option 2+) was considered to meet the concerns of the planning inspector's pre-submission review expressed in February 2009 relation to previous Option 2A, and the perceived lack of clear reasoning to support that option. Option 2+ was derived from the previous Options 1 and 2 which were respectively the previous Preferred Option, and a reasonable alternative option that more explicitly recognised the needs (i.e. for a bypass) and potential of Long Stratton, while being supported by the results of consultations, study evidence and the sustainability appraisals. The results of the sustainability appraisals are discussed in greater detail in the following section followed by the proposed mitigations and their impact on the overall strategy.¹ The overall response to the Inspectors' question in paragraph 1.2.1 is concluded in Section 6 below.

4. Sustainability Appraisal (SA): a commentary on its conclusions with reference to the proposed mitigations and Long Stratton

- 4.1 A series of sustainability appraisals² was carried out to accompany the different stages of the development of growth options and the overall strategy. These informed Members in their considerations but were not the sole determinant of the finally chosen policies and growth options. These

¹ Planning consultants Barton Willmore expressed concerns in a letter to the Planning Inspectors dated 17 June 2010 (in response to the GNDP letter of 8 June 2010 to the Inspectors regarding the conclusions of the Exploratory meeting of 13 May) that Option 2+ had been produced in an impossibly short time following the receiving by the GNDP of the Planning Inspector's pre-submission review advice dated 17/2/09, for consideration at the GNDP Policy Group on 19/2/09. In response to this, the concerns of the Inspector (Laura Graham) had already been communicated in a draft letter dated 2/2/09 and through a visit made soon after to the GNDP. This enabled the GNDP officers to respond appropriately to her concerns through the production of an evidence-based alternative option in the spirit of Option 2A which became the Favoured Option, having been considered by GNDP Members on 19/2/09).

² The summary conclusions of the sustainability appraisals carried out with regard to the main stages of the preparation of the strategy, i.e. the Issues and Options Consultation Report, Regulation 25 Consultations and the Pre-Submission version of the JCS are shown in Appendix 4.

also reflected evidence gathered from technical studies and other consultation responses.

- 4.2 The SA iterations raised a number of significant potentially uncertain or negative issues that were considered during the evolution of the Favoured Option. These referred to:
- water supply and waste water disposal issues,
 - secondary education provision,
 - public transport provision and use and
 - the lack of potential for enhanced sustainable transport links to Long Stratton, which was also considered to be relatively isolated from strategic employment locations and higher order centres.
- 4.3 The Favoured Option and the distribution of growth in South Norfolk in particular were considered to raise issues affecting accessibility to services and facilities, the provision of secondary education and public transport provision and its use. The SA of the Pre-Submission version of the JCS (Doc. Ref: JCS 3) however specifically recommended the development of a bespoke vision to achieve a degree of self containment for Long Stratton in reflection of its significant range of accessible services, facilities and job opportunities. This would reduce any uncertain impacts of its provisions for major growth on the overall growth strategy and its associated accessibility issues, even though the Regulation 25 Consultation SA (Doc Ref: EIP 14) had stated that the scale of growth propose for Long Stratton did not significantly affect the sustainability of the favoured growth option.
- 4.4 It should be noted that the water supply and waste water disposal issues only emerged at a relatively late stage in the evolution of the growth options, due to the time required to carry out the different stages of the necessary background Water Cycle Study, and the revisions of its conclusions regarding the potential accommodation of growth needs. Further work continues on the potential mitigations of these issues as detailed in section b) Mitigations (paragraph 4.30 onwards) below. However it should also be noted that the water supply issue affects the whole JCS area and thus has not been a significant factor regarding the potential distributions of growth.
- 4.5 The Greater Norwich Development Partnership considers that there are mitigations to be implemented which will overcome all of the above issues. The conclusions of the SA are discussed in the following section followed by the mitigations proposed to ensure continued sustainable development within the NPA.

a) Commentary on the SA conclusions

i) The Issues and Options Consultation SA (EIP 12)

- 4.6 This SA appraised individual questions which included (among other things)
- three strategy options for the proposed scales of new development (Question 11),
 - the effects of locating at twelve potential broad growth locations (Question 12),

- options for the distribution of large scale growth (Question 13), and
 - the principle of providing for growth at Long Stratton to provide for a bypass (Question 32).
- 4.7 Overall growth: This SA did not draw particular conclusions about the actual dispersal of growth (Question 11), albeit it stated that further research would be especially important to determine the constraints, opportunities and drawbacks of each possible growth location.
- 4.8 Re Question 12), the SA of the impacts of growth at all twelve potential growth locations was shown by two colour coded tables assessing each growth location against respectively, the JCS Objectives and the SA Objectives. This informed the choice of the initial draft Preferred Growth Option (referred to subsequently as Option 1) of three large and one smaller potential major growth location (i.e. outside Norwich and its fringe parishes).
- 4.9 The SA of Question 13) considered the advantages and disadvantages of concentration versus dispersal, and recommended the need for further research into their potential environmental effects.
- 4.10 Long Stratton: While Long Stratton was referred to by Question 12) as a potential growth location, it was not included in the subsequent initial draft Preferred Option for growth which was based on a south west-north east axis across the NPA. This reflected the locations that demonstrated the most positive effects when compared to both JCS and SA objectives. However while Long Stratton had not been considered to be one of the best potential growth locations at this stage, it did not score badly when assessed against these objectives.
- 4.11 When compared to the Question 12 assessments of the effects on the JCS Objectives, Long Stratton had significantly fewer negative effects than most of the rejected growth locations, and more positive effects than all of the rejected growth locations as well as the two favoured West and North East (outside the Northern Distributor Road) growth location options. Long Stratton also had a below average number of “mixed” effects.
- 4.12 With regard to the Question 12 assessments of the effects on the SA objectives, when compared to Long Stratton, only one rejected growth location had fewer negative effects, and only one rejected option had more positive effects. Again Long Stratton had a below average number of “mixed” effects. Therefore although Long Stratton was not part of the Draft Preferred Option that followed on from this stage, the above analyses showed that on balance, if it had been included, it would have provided for a reasonable alternative choice when judged against JCS and SA Objectives.
- 4.13 The SA of Question 32 overall summary concluded that the promotion of major mixed use growth at Long Stratton to secure strategic improvements to the A140 would work with a concentrated approach to development locations, promotion of rural employment and public transport measures, and strategies that sought to increase the provision of affordable housing in new developments. An important proviso was that large scale development would not automatically lead to the construction and delivery of the proposed bypass as there were many other factors involved. Other conclusions

referred to the negative impacts of large scale development without a bypass resulting in increased congestion, less reliable public transport and the increased environmental impacts of traffic.

ii) The Regulation 25 Consultation SA (EIP14)

- 4.14 The SA for the Regulation 25 consultations included the first detailed SA of the potential individual growth locations as well as the overall major growth area options.
- 4.15 The individual location assessments included the choice of **Long Stratton with provision of a bypass**. This concluded that a bypass would bring local and strategic benefits on the A140 corridor at the possible price of compromising the provisions of affordable housing, and that Long Stratton was the most distant growth location from Norwich and strategic employment opportunities with a limited potential for the delivery of fast, frequent high quality public transport links to key destinations in the NPA. Overall however Long Stratton received an average score. This was not a bad assessment and related broadly to the previous SA of the Issues and Options Question 32. (These Long Stratton impacts were also common to the assessments of growth Options 2-3 and Option 2+).
- 4.16 **The Regulation 25 Technical Consultation referred to three growth options** of which Option 1 had been based on a full SA, whereas Options 2 and 3 had evolved through an internal “sustainability test” process. Options 2-3 were subsequently subject to the full SA process in parallel to the Technical Consultation period when all three options’ SAs were also checked by independent consultants.
- 4.17 The summary conclusions for the three options considered that Option 1 generally performed very well, Option 2 performed well, while Option 3 was considered to have generally positive impacts. The SAs of these options however acknowledged that the redistribution of growth in Option 2 had sustainable transport disadvantages in relation to Option 1, but was still better than Option 3.
- 4.18 There were also issues related to Options 2 and 3 regarding **Long Stratton’s** location in relation to Norwich and other centres, the reduced potential to improve Long Stratton’s public transport links (albeit this assumed an unimproved A140 corridor), and bypass funding uncertainties and impacts on the provision of other infrastructure. Overall the SA showed social and economic benefits too, albeit education provision was considered to be compromised in Long Stratton and Wymondham. While the implementation of sustainable transport and services were seen to be the key to development, the SA considered that the scales of growth at Long Stratton in Options 2 and 3 were a small proportion of the JCS total requirement which did not significantly affect the sustainability of those options.
- 4.19 **The Regulation 25 Public Consultation focussed on the Favoured Option (Option 2+)** which was assessed to have generally positive impacts. However the SA also expressed uncertainties regarding the impact of the dispersed pattern of growth in South Norfolk on secondary education provision and the provision of sustainable transport in the A11 corridor, and

uncertainties regarding the funding of the Long Stratton bypass and its possibly negative impact on the funding of other infrastructure. It also repeated the concerns about the potential for Long Stratton to be less sustainable due to increased travel distances Norwich and other employment centres. However it also considered that the scale of growth in Long Stratton was a small proportion of the overall requirement across the strategy area and in itself did not have a significant effect on the sustainability of this growth option.

iii) The Pre-Submission Joint Core Strategy SA (Document Ref: JCS 3)

- 4.20 The SA of the pre-Submission JCS repeated the SAs of the three main growth options and assessed the individual policies of the JCS.
- 4.21 With regard to **Policy 9 “Strategy for growth in the Norwich Policy Area”**, it questioned the impacts of the dispersed pattern of growth in South Norfolk on the ability to provide in the short term for services and facilities, and its impacts on the development of sustainable patterns of transport. The relative isolation of Long Stratton in particular was queried in relation to its accessibility to strategic employment locations and lack of potential to provide for a bus rapid transit service. However Long Stratton was also judged to have a good range of existing services, facilities and employment opportunities which would be enhanced in association with proposed housing development. Many benefits of the overall growth option were also apparent, and while there were concerns about water resources, there was little to suggest that there would be any significant effects on existing communities that could not be addressed or mitigated.
- 4.22 With regard to **Policy 12 “Locations of major new or expanded communities in the Norwich Policy Area”**, the policy identifies the necessary requirements to achieve sustainable patterns of development and transport, while mitigating the potential negative effects of the proposed growth. The SA raised issues relating to the mixed impacts of the strategy on reducing traffic impacts, and uncertainties regarding the provision of secondary education and Bus Rapid Transit for locations in South Norfolk in the South West and Wymondham in particular. It also raised location and accessibility issues related to Long Stratton, but recommended that these could be overcome by the development of a bespoke vision to achieve a degree of self containment for Long Stratton.

iv) SA Summary

- 4.23 **Overall growth:** The results of the SA for the Regulation 25 Public Consultation showed that the Favoured Option had generally positive impacts, albeit it may have also concluded a number of mixed and negative effects. However the SA was only part of the consideration of the choice of growth option which also had to take into account a variety of other factors and the potential results of ongoing work to mitigate any outstanding potentially negative effects.

- 4.24 The Pre-Submission JCS SA further assessed each JCS policy including Policies 9 and 12 which provide respectively for the NPA Growth Strategy and the locations for major new or expanded communities in the NPA. While this added to the previous uncertainties regarding the impacts of dispersed growth in South Norfolk with concerns about the ability to provide for services and facilities in the short term, it concluded that many benefits were apparent and suggested that there were unlikely to be any significant effects that could not be addressed or mitigated.
- 4.25 **Long Stratton:** Certain elements of the SA may also be misinterpreted to exaggerate potentially adverse impacts of the inclusion of Long Stratton, yet significant parts of the SA also point to the benefits of locating growth in Long Stratton based on its provision of a good range of services and facilities and local job opportunities.
- 4.26 The Issues and Options Consultation SA showed that Long Stratton did not score badly when compared to the JCS and SA Objectives which implied that on balance, it would have provided for a reasonable alternative choice of growth location if it had been included within the initial draft Preferred Option. It also considered that the promotion of Long Stratton to secure strategic improvements to the A140 would have worked within certain circumstances.
- 4.27 The Regulation 25 Consultation SA assessed Long Stratton with a bypass in detail, assessed the benefits and disadvantages of this location and concluded that it had an average score. In relation to the overall growth options 2 and 3 of which Long Stratton formed a part, the Regulation 25 Consultation SA concluded that the choice of Long Stratton and its scale of growth did not significantly affect the sustainability of those options.
- 4.28 The Pre-Submission JCS SA re Policy 9 queried Long Stratton's relative isolation and its impacts on the potential to develop sustainable transport, but judged it to have a good range of services, facilities and job opportunities which would be enhanced in association with the proposed housing development. The SA of Policy 12 also raised location and accessibility issues re Long Stratton but recommended that these could be overcome by the development of a bespoke vision to achieve a degree of self containment for the settlement.
- 4.29 Therefore with the mitigations in place that are referred to below, the Greater Norwich Development Partnership considers that the strategy should provide for sustainable growth overall and the requisite encouragement of additional public transport, walking and cycling.

b) The Mitigations

- 4.30 While the SA iterations raised a number of significant potentially uncertain or negative issues that were considered during the evolution of the Favoured Option (see Section 4 above), not all of the issues of concern were considered to affect the consideration of the distribution of growth. The most significant of these was the identification of the potentially negative impacts of the favoured option on water supply. However this is a universal issue that reflects the overall requirements of the total housing provisions of the JCS,

and affects all potential growth locations in the NPA, as they are all served by the same water treatment works at Heigham in Norwich.

4.31 The concerns identified by the iterative SA process which affect particular locations and are considered to require mitigations therefore include:

- waste water disposal
- secondary education provision,
- public transport provision and use
- the potential for enhanced sustainable transport links to Long Stratton, which was also considered to be relatively isolated from strategic employment locations and higher order centres.
- the development of a bespoke vision to achieve a degree of self containment for Long Stratton to overcome the issues raised by its relative isolation from Norwich and strategic employment locations

Waste water disposal

4.32 The evolution of the Water Cycle Studies has revealed waste water disposal issues that could prevent or lead to the phasing of development proposed in certain locations, unless mitigation measures are in place. Continuing discussions are in hand to address these issues in association with Anglian Water, the Environment Agency and Natural England. Each of these organisations supplied a Position Statement to confirm their views regarding water supply and waste water disposal issues at the time of the submission of the JCS in March 2010.

4.33 The Water Cycle Studies also concluded at a late stage that there were significant waste water disposal constraints affecting the waste water treatment works (WwTWs) at Acle, Aylsham and Reepham, and more limited constraints affecting the WwTW at Long Stratton. All of these serve areas currently proposed to receive housing growth in the JCS. Discussions are in hand with Anglian Water which considers that its already planned improvements to the Acle WwTW may enable it to accommodate JCS growth, but answers to the issues elsewhere remain under investigation. Anglian Water is also confident that more limited WwTW constraints affecting a small part of the proposed growth at Long Stratton can be overcome.

4.34 The Water Cycle Study also concluded the need for two strategic trunk sewers to link proposed growth areas to the west/south west and to the north east of Norwich with the Whitlingham WwTW, which has sufficient spare capacity to accommodate the needs of JCS growth. Informal discussions with Anglian Water have suggested that there may be more easily delivered alternative options to serve growth to the south west and west of Norwich.

4.35 Updated Position Statements will be prepared in advance of the JCS Public Examination by Anglian Water, the Environment Agency and Natural England, to update their views regarding water supply and waste water disposal issues in relation to the provisions required for JCS growth. The Anglian Water submissions will cover water supply, waste water disposal and strategic sewers.

Secondary Education provision

- 4.36 The Regulation 25 Consultation SA of growth Option 2+ considered that this option had uncertain education consequences, as there was no single and obvious solution to meet the secondary education needs of the more dispersed pattern of growth in South Norfolk. The Pre-Submission JCS SA also raised concerns (under Policy 12) about the provision of education facilities and highlighted uncertainties remaining for Wymondham, Hethersett, Cringleford and Costessey.
- 4.37 In response to such concerns, Norfolk County Council Childrens' Services is investigating options for the development of schools to accommodate the proposed growth in association with school governing bodies. A range of options will be submitted as evidence to the JCS Public Examination. The Greater Norwich Development Partnership remains confident that the appropriate schools will be provided.

Public transport provision and use

- 4.38 In response to the Inspectors' requirements in paragraphs 1.2.2 and 1.2.3, the means of improving the provisions for and use of public transport, and the potential means of enhancing sustainable transport links to Long Stratton, which was considered to be relatively isolated from strategic employment locations and higher order centres, are discussed in Section 5.

The development of a bespoke vision to achieve a degree of self containment for Long Stratton

- 4.39 Iterations of the sustainability appraisals raised concerns about the inclusion of Long Stratton as a major growth location, its relative isolation from Norwich and other strategic employment locations, and a perceived lack of potential for the improvement of its sustainable transport links to the strategic employment locations.
- 4.40 The soundness of Long Stratton as a proposed growth location however is considered to be supported by comments made by iterations of the SA as set out in Section 4) of this response. The comments made by the SA iterations did not support the notion that the proposed growth location undoubtedly had a significant negative effect on the strategy as suggested by the detailed comments that accompanied the Inspectors' requirements. The Regulation 25 Consultation SA of the Favoured Option (document Ref: EIP 14) considered that the scale of growth in Long Stratton was a small proportion of the overall requirement across the strategy area and in itself did not have a significant effect on the sustainability of this growth option.
- 4.41 The Pre-Submission JCS SA (document Ref: JCS 3) judged Long Stratton to have a good range of existing services, facilities and employment opportunities which would be enhanced in association with proposed housing development. Therefore while it had also raised location and accessibility issues related to the settlement, it recommended that these could be overcome by the development of a bespoke vision to achieve a degree of self containment for Long Stratton.

- 4.42 The GNDP considers that this would be an appropriate way forward in mitigation of the issues raised, and a paper setting out the basis for the development of such a vision for Long Stratton and the evidence supporting a case for its self containment is shown as **Appendix 6**.
- 4.43 The paper regarding the development of a vision for Long Stratton should also be read in conjunction with the County Council responses regarding the potential to improve public transport provisions and Long Stratton's sustainable transport accessibility in Section 5) below and the supplementary paper, "Norwich Area Transportation Strategy Implementation Plan: report in Response to Inspectors' Comments following the Exploratory Meeting".

5. Public transport improvements and modal shift targets

- 5.1 In response to the Inspector's requirements this section addresses
- the issues regarding public transport, its use and provision,
 - evidence that supports the potential for public transport improvements,
 - references to how the Norwich Area Transportation Strategy (NATS) Implementation Plan incorporates public transport improvements and walking and cycling opportunities,
 - the potential for enhanced sustainable transport links to Long Stratton,
 - references to a base line for measuring public transport usage, modal shift targets and their means of monitoring,
 - and references to detailed issues also raised by the Inspectors relating to public transport in the A11 corridor with reference to bus rapid transit.
- 5.2 Section 5 of the supplementary paper, 'Norwich Area Transportation Strategy Implementation Plan - Report in Response to Inspectors' Comments following the Exploratory Meeting' (Ref: xxxx) sets out the current and proposed public transport position for the major growth locations. The section demonstrates that all the major growth locations can be served by high quality public transport.
- 5.3 With the exception of Long Stratton, all of the Strategic Growth Locations have the capacity to support an all day turn up and go service that could be enhanced to Bus Rapid Transit. Para 5.3.4 of the paper has assessed the A11 corridor to review the viability in light of the Inspectors' line of questioning. Review of the work shows that the earlier work reported in the JCS Sustainability Appraisal did not look at the full "in combination" effects on the A11 corridor, nor did it add in the potential from existing households. Having considered all these factors, the corridor only needs another 1200 or so homes to make BRT viable. The strategy proposes 4400 dwellings which could clearly support BRT.
- 5.4 The only exception to provision of a 10 min turn up and go service is Long Stratton, which can support a 15 service with certainty. Details are in Appendix E of the supplementary paper (Ref: xxxx). This report demonstrates that these levels of service are viable and shows how existing services can be built upon to attain those final levels.

- 5.5 It can be concluded that the distribution of growth promoted within the JCS does support the delivery of high quality public transport provision to support major growth.
- 5.6 The JCS itself does not ascribe modal share targets. The JCS has been shown to put in place a strategy that can be well served by public transport. The delivery monitoring and management of transport enhancements will come through the Norwich Area Transportation Strategy. Norfolk County Council is working on a regime of monitoring for not only NATS, but the emerging 3rd local transport plan. This monitoring plan will be the management tool for transport interventions and will be where transport specific objectives and targets are set and monitored for NATS.
- 5.7 The references in the supplementary paper (Ref:xxxx) to enhanced public transport provisions for Long Stratton should also be read alongside the means of providing for the soundness of Long Stratton as a growth location through the development of a Vision for its development as a self contained centre, as referred to in Paragraph 4.39 onwards above.

6. Conclusion

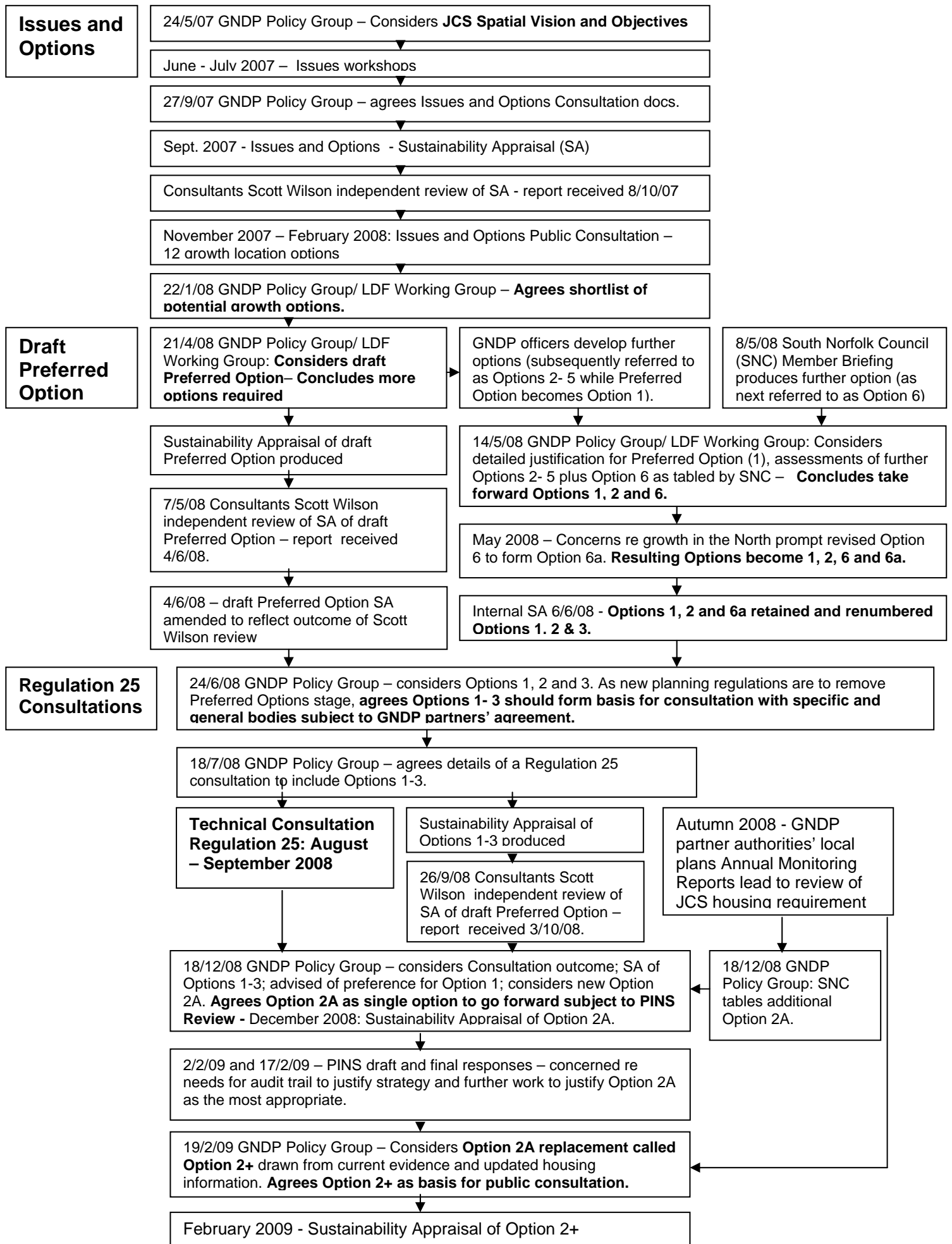
- 6.1 The summary and detailed audit trails explain the considerations of the JCS growth options leading to the choice of the Favoured Option (Option 2+) (Appendices 1, 2 and 3) which differed in its derivation from the preceding Option 2A. The audit trails show that the SA was only one consideration of many. Although the results of the SA may have concluded a number of mixed and negative effects arising from the choice of the Favoured Option in the JCS, the choice also had to take into account consultation responses, political wishes reflecting local accountability (which continues to gain significance in accordance with the aims of the current government's "localism" agenda), and the potential results of the ongoing work to mitigate certain potentially negative effects. The growth option with the best SA was not guaranteed to be the final favoured option in view of the other considerations and the beneficial impacts of potential mitigations.
- 6.2 The concerns raised by the SA process have been explained above. They centre largely on the impacts on the overall growth strategy for the NPA of the chosen distribution of growth in South Norfolk in relation to mainly secondary education provision and public transport provision issues, the latter largely relating to the potential ability to increase the use of public transport in the A11 and A140 corridors. The inclusion of Long Stratton as a growth location has also raised issues relating to its sustainability and a perceived less than well accessed location in relation to Norwich and strategic employment centres, and its impact on the strategy's ability to maximise the use of public transport. Other location issues relate to wastewater disposal across a wider area.
- 6.3 The GNPD considers that the overall distribution of growth proposed is sound, as the issues identified by the SA and evidence studies will be addressed by the appropriate mitigations and the encouragement of public

transport uses through the implementation of the Norwich Area Transportation Strategy and Norfolk County Council transport policies in general. The secondary education issues are being addressed by Norfolk County Council. The waste water disposal issues are being addressed by Anglian Water Services, the Environment Agency and Natural England, who will present updated evidence to the JCS Public Examination.

- 6.4 The soundness of Long Stratton as a growth location will be also be supported by the development of a Vision for the development of the settlement as a more self-contained entity, the impact of proposed enhanced public transport provisions and the long awaited local environmental benefits of the development of a bypass. This is notwithstanding the fact that the Regulation 25 Consultation SA of the favoured growth option (2+) (Doc Ref: JCS 3) considered that the scale of growth in Long Stratton was a small proportion of the overall requirement across the strategy area, and while locally significant, did not significantly affect the sustainability of that growth option.
- 6.5 There will be no such thing as a perfect strategy for growth, and the JCS incurs some compromises. However with the suggested and necessary mitigations in place, the Greater Norwich Development Partnership considers that the strategy should provide for an acceptable distribution of sustainable growth able to meet local needs, with good access to essential services, facilities and jobs, while providing for a significant shift towards the use of sustainable (including public) transport.

INSPECTOR'S RESPONSES - Q3)
JCS Housing Growth Options: Summary of Audit Trail to Option 2+

APPENDIX 1



JCS Growth Options: Audit trail leading to Option 2+ (i.e. the Norwich Policy Area Favoured Option and basis of the Submitted JCS)
(To be read alongside accompanying Appendices 1 and 3).

Significant Dates	Consultations, reviews, Growth Options under consideration.	SA	Actions <i>(References to topic paper TP8 refer to the Topic Paper: “Strategy to Accommodate Major Housing growth in the Norwich Policy Area”, of which chapter 6 quantifies all growth distribution options)</i>
24/5/07 GNDP Policy Group	Draft Spatial Vision and Objectives		<ul style="list-style-type: none"> • Members considered the draft spatial vision and objectives, noted that the vision was in the process of further amendment to ensure “local distinctiveness” and that there would be further opportunities to comment on it prior to its adoption and public consultation proposed for the Autumn. • Members raised an issue regarding potential housing allocations in South Norfolk in relation to the availability of jobs. • Members noted a schedule of proposed technical workshops to be held between 22 June 2007 and 6 July 2007.
5/6/07 GNDP Policy Group/ Local Development Framework (LDF) Working Group	Workshops and issues topic papers		<ul style="list-style-type: none"> • Members considered and approved the workshop organisation and topic paper content.
22 June – 6 July 2007.	Evidence gathering workshops held with key stakeholders		<ul style="list-style-type: none"> • Considered a series of topic papers on the spatial planning issues to be addressed including the Vision. • Issues and Options informal discussion workshops topic papers – see Doc. Ref: STA 1. • The outcomes informed the shaping of the potential growth-related issues and options to be addressed by the Joint Core Strategy consultation.
21/8/07 GNDP Policy Group/ LDF Working Group	Draft Issues and Options Consultation Document		<ul style="list-style-type: none"> • First draft Issues and Options document considered by Members.as informed by outcomes of evidence gathering workshops .including comments on the draft Vision and Objectives.
27/9/07	Draft Issues		<ul style="list-style-type: none"> • Draft considered to be subject to approval by GNDP partner authorities.

GNDP Policy Group	and Options Consultation Document		
Sept/Oct 2007		X	<ul style="list-style-type: none"> • Sustainability Appraisal (SA) was carried out of the Issues and Options to support the consultation questions. • This included a high level examination of the sustainability issues relevant to each growth location in association with the Issues and Options Consultation Report November 2007 Question 12. • This Sustainability Appraisal was also submitted to consultants Scott Wilson for an independent check. Scott Wilson reported back on 8/10/07.
October 2007	Draft Issues and Options Consultation Document		<ul style="list-style-type: none"> • Considered by GNDP partner authorities and approved for public consultation.
November 2007 – February 2008	“Issues and Options” public consultation		<ul style="list-style-type: none"> • See Document Ref: STA 2 • Consulted on 12 potential major growth locations (JCS p31 and Appendix 4)
22/1/08 GNDP Policy Group/ Local Development Framework Working Group	Shortlist of growth options		<ul style="list-style-type: none"> • Considered the factors influencing the sizes and numbers and concentration or dispersal of potential sustainable communities required to meet the Regional Spatial Strategy (RSS) housing requirements. • Considered the Issues and Options consultation options and preliminary results of the evidence studies and the SA, which in combination suggested a shortlist of the four potential growth options of Wymondham, the South West, the West and the North East (inside and outside the Northern Distributor Road (NDR)). • The evidence studies included those covering infrastructure needs and funding; employment growth, sites and premises; the strategic flood risk assessment; the water cycle study (Stage 1); the green infrastructure study and the retail and town centres study. • Concerns were raised about the impact of significant development on Wymondham (South Norfolk Council Members), the required overall level of development and the provision of green space and infrastructure. • Members agreed with the key growth locations and delivery timetable as a basis on which to proceed.
21/4/08 GNDP Policy Group/ LDF Working	Draft Preferred Option		<ul style="list-style-type: none"> • Considered responses to the Issues and Options summary leaflet consultation. • Considered an initial draft Preferred Option for growth and an initial draft version of the Joint Core Strategy (JCS).

Group			<ul style="list-style-type: none"> • This draft JCS described the results of the Issues and Options consultation, the SA, the RSS requirements and information derived from the evidence studies (produced so far) from which conclusions were drawn in support of the draft Preferred Option for growth in the NPA, i.e. the three large and one medium scale growth locations (Agenda pages 125-131). • This draft also described the rejected growth options (including rejected major growth locations), and the reasons for their rejection (Agenda pages 131-132). • The draft Preferred Option (later referred to as Option 1) was as summarised in topic paper TP8, Table 1. • This proposed an urban extension to the North East (dependent on the NDR), a country town to the South, the urban expansion of Wymondham and development to the West. • Rejected growth options included the greater dispersal of development in a single large new town, potential growth locations to the North West, East, South East, South and Long Stratton, and a different growth distribution between Broadland and South Norfolk districts. • Concerns were raised (among other things) about the large scale housing growth in the Preferred Option including its distribution between districts, the choices of particular locations, the links between infrastructure delivery and the quantum of development achievable, and phasing. • Members agreed (among other things) that GNDP officers should develop further growth options for consideration at a further working group.
7/5/08	Draft Preferred Option	X	<ul style="list-style-type: none"> • Sustainability Appraisal - Scott Wilson commissioned to review the Sustainability Appraisal of the draft Preferred Option. • Scott Wilson reported back on 4/6/08.
May 2008			<ul style="list-style-type: none"> • GNDP officers develop further growth options (subsequently numbered Options 2-5).
8/5/08	South Norfolk Council additional option		<ul style="list-style-type: none"> • An additional further growth option was produced by a South Norfolk Council Member Briefing. • This reflected South Norfolk Council's concerns about the distribution of growth in the draft Preferred Option. It proposed broadly that provisions for Hethersett and the West be replaced by provisions for a stand alone settlement (south of the A47 west of the A140) plus provisions for Long Stratton, a reduced emphasis on Wymondham and increased growth to the North of Norwich. • This option was subsequently numbered Option 6 and considered at the 14/5/08 GNDP LDF Working group (see below).
14/5/08	Draft Preferred		<ul style="list-style-type: none"> • Considered detailed justification for the draft Preferred Option, the interdependencies

<p>GNDP LDF Working Group</p> <p>(NB: date corrected from topic paper ref: TP8 which shows 24/5/08)</p>	<p>Option and Options 2- 6</p>		<p>between growth and the required infrastructure (Agenda Section 3) and the justification for the sizes and distribution of the proposed development (Agenda Section 4).</p> <ul style="list-style-type: none"> • Considered further options as shown in topic paper TP8, Table 1, accompanied by their broad assessments compared to the consultation responses and SA results represented as scores (Agenda Section 4) for all of the potential growth areas as tabled for information. <i>(This was considered to represent a broad “sustainability test” as also referred to below).</i> • The further growth Options 2-5 had been developed by officers. These were supplemented by the tabling of the above South Norfolk Council option shown as Option 6, but this required further assessment. • (NB: The working group Agenda Section 4.1 table contains incorrect Option 1 figures which were corrected at the meeting to show Hethersett as 4000 dwellings, and the West as 2000 dwellings, i.e. as shown correctly in topic paper TP8, Table 1). • A more detailed explanation of the suggested choice of options in the draft Preferred Options document was also provided for the LDF Working Group (Agenda, Section 3). The Preferred Option was chosen because of (in broad terms): <ul style="list-style-type: none"> • The prospects of providing adequate infrastructure • A close relationship between housing and a choice of employment locations giving the opportunity of living near to a workplace • The prospects of achieving self containment in larger growth locations • The potential to maximize public transport opportunities / investment in larger areas. • Opportunities to ensure growth could continue into the longer term to meet commitments from 2026. • It was advised that options 3, 4 and 5 should be deleted, as they did not perform well against the “sustainability test”. Option 4 also raised concerns regarding the delivery of its necessary infrastructure, while Option 5 would not deliver sufficient new housing within the plan period to meet the housing requirements of the East of England Plan. • It was concluded that Options 1, 2 and 6 should be subject to a detailed appraisal (as Option 6 had also not been evaluated to the same degree) for consideration at the 24/6/08 Policy Group..
<p>May 2008</p>	<p>Options 1, 2, 6 and 6a.</p>		<ul style="list-style-type: none"> • Option 6: the inclusion of the North as a growth location raised concerns about its lack of potential for sustainable travel (despite its proximity to Norwich Airport), potential travel generation dependent upon a Norwich Northern Distributor Road and the resulting potentially adverse impacts on air quality. • Norfolk County Council was also concerned about the untested impacts of the proposed 2000 dwellings provisions in the North on the Northern Distributor Road which would have required

			<p>significant additional investigation.</p> <ul style="list-style-type: none"> • Consequently concerns relating to growth in the North resulted in the proposal by GNDP officers for an additional option based on a revised Option 6 that divided the growth proposed for the North equally between the “Broadland Smaller Sites” and the West, i.e. Costessey/Easton. • This option was numbered Option 6a.
4/6/08	All growth locations	X	<ul style="list-style-type: none"> • Issues and Options Sustainability Appraisal modified to reflect comments by Scott Wilson and to form an input into the subsequent iterations of growth options.
6/6/08	Options 1, 2 and 6a.	X	<ul style="list-style-type: none"> • A “sustainability test” was carried out by GNDP officers for Options 2, 6 and 6a, as the Preferred Option (1) had already been the subject of a SA. • Option 6 performed relatively less well against this test, so the options were reduced to Options 1, 2 and 6a. • Options 1 and 2 remained unchanged, and Option 6a was renumbered 3. • The options were thus numbered Options 1, 2 and 3 for consideration by the Policy Group on 24/6/08.
24/6/08 GNDP Policy Group	Options 1- 3:		<ul style="list-style-type: none"> • Considered a second draft of the Joint Core Strategy Preferred Options document which retained Preferred Option 1. • Also considered alternative growth Options 2 and 3 alongside Option 1 (Agenda Item 8b) as also quantified in topic paper TP8, Table 2. • Option 1 therefore remained as a recommended preference. • Option 2 reduced the major allocation at Wymondham to 2000 and allocated this to Long Stratton to assist the delivery of a bypass for the village. • Option 3 reduced the major allocations at Wymondham to 2000 and Costessey/Easton to 1000, while allocating a further 1000 to the Broadland suburban fringe, 1500 to Long Stratton to assist the delivery of a bypass, and 4500 to a new settlement based around Mangreen, to the south of the A47, east of the A11 and west of the A140. (Source: Minutes of the meeting). (NB: The Option 3 Mangreen proposal also replaced the Options 1 and 2 provisions for the South West - Hethersett/Little Melton area. • Agenda Items 8a and 8b also provided supporting information for the options including the growth locations Sustainability Appraisal summary scores table and detailed assessment tables showing the deliverability of the options. The latter tables included information on the growth options’ synergies and conflicts, plus location-specific constraints, opportunities, comments and infrastructure requirements. • Was also informed that the Town and Country Planning Regulations governing LDFs were to change from 27/6/08. These were to replace the “Issues and Options” stage with a new consultation (Regulation 25) on the content to be included in the JCS, and were to remove the

			<p>need for a “Preferred Options” stage.</p> <ul style="list-style-type: none"> Therefore it was agreed that Options 1- 3 could be the basis for a wider consultation with specific and general bodies, subject to the outcomes of the meetings of the GNDP member cabinets/executives on 18/7/08.
18/7/08 GNDP Policy Group and meetings of GNDP member cabinets/ executives	Options 1- 3		<ul style="list-style-type: none"> Considered the draft final versions of the JCS documents for consultation under Regulation 25, plus the consultation timetable and procedures. Considered a “growth options report” for consultation containing an updated spatial vision, objectives, overarching principles for sustainable development and three separate proposals for combinations of places for major growth. (NB: the consultation did not emphasise the previous Preferred Option (1)). Also considered the complete Issues and Options consultation responses Noted that a full SA was not required at this stage but would continue to be developed and audited Noted the need to deliver at least the minimum housing requirements of the RSS and growth that is public transport focused, Noted that the growth areas could not be phased sequentially but had to be available concurrently to provide for flexibility in meeting the RSS housing requirements by 2026. Agreed that Options 1- 3 should be the basis for a consultation to satisfy the requirements of Regulation 25, subject to limited changes and the formal approval of the GNDP partner authorities.
August 2008 – September 2008	Regulation 25 Technical Consultation		
3/9/08	Options 1-3	X	<ul style="list-style-type: none"> Sustainability Appraisal for Options 1 - 3 completed. Subsequently submitted to consultants Scott Wilson for independent checking (in parallel to the JCS Technical Consultation) who responded on 3/10/08.
Autumn 2008	GNDP partner authorities’ Annual Monitoring Reports and JCS Housing requirement review		<ul style="list-style-type: none"> The results of the 2008 Annual Monitoring Report for Norwich City showed that the number of new homes potentially deliverable from new allocations in Norwich had fallen from the Joint Core Strategy requirement for 4000 to some 3000, based on house building monitored to 31/3/08. Monitoring in Broadland and South Norfolk districts showed declining numbers of house completions in Broadland and rising numbers of completions in South Norfolk. The opportunity was taken therefore to update the Joint Core Strategy Housing Requirement from a base date of 1/4/06 to 1/4/08.

			<ul style="list-style-type: none"> This was first taken on board by the additional growth option tabled by South Norfolk Council at the 18/12/08 GNDP Policy Group (i.e. referred to later as Option 2A).
<p>18/12/08 GNDP Policy Group</p>	<p>Options 1-3</p> <p>“Favoured Option” (based on Option 1)</p> <p>Option 2A</p>		<ul style="list-style-type: none"> Considered a report on the Regulation 25 technical consultation and the accompanying Regulation 25 Consultation Evidence Report. The Evidence Report contained among other things, an analysis of Options 1- 3, summary responses from the Technical Consultation in relation to the three options, and the overall conclusions of the Sustainability Appraisals of the three alternative options. Agenda Item 5a Paragraph 3.1 of the report refers to the updating of the housing base date figures and states that “The revised figures indicate that the number of new allocations required for the Norwich Policy Area could be reduced from 24,000 to 21,000.” Members were advised that there was a clear preference in favour of Option 1 arising from the evidence submitted, and that, “ Members would need to form their own opinion based on the evidence received to date, and that emerging from the further consultations with technical bodies, development interests and local communities.” (Source: Minutes to the meeting, as noted by Topic Paper TP8), Members were requested “to agree a single favoured option based on the evidence gathered in order to go forward for full public consultation and further technical work in preparation for the submission stage”. At the same meeting, South Norfolk Council presented a further option referred to as Option 2A (as shown by Topic Paper TP8, page 7). This was based on Options 2 and 3 and addressed members’ concerns. (See “Commentary” below). <i>(NB: The Agenda Appendix B shows Option 2A housing numbers totalling 21,000, with provisions for an additional 2,000 dwellings to be developed at Mangreen pre-2026. While not noted at the time, the overall total should have been shown as 23,000 dwellings to 2026).</i> Advance notice of the tabled Option 2A enabled Members to be presented with supplementary information on 18/12/08 summarising the advantages and disadvantages of Option 2A. (NB: This information may be referred to in the Minutes of the meeting of 18/12/08 as reported to the Policy group of 19/2/09). Members were informed that while the spatial distribution proposed in Option 2A had the potential to better fit the existing settlement character and pattern of South Norfolk, it presented some significant challenges that would need to be pursued, if this option was to be taken forward.

		<ul style="list-style-type: none"> • Members expressed concerns regarding the increased costs of the provision of infrastructure, the soundness of the proposal and the effect that it might have on residents within Broadland District and Norwich City Council areas. Support was received regarding the importance of the A140 and its need for improvements, while note was made that if not fully funded, the Long Stratton bypass costs would impact on services and infrastructure elsewhere. A potential high school capacity solution noted for Wymondham was the provision of a sixth form centre on a separate site that would free capacity at the main high school. • Members also considered the increased costs of developing Option 2A, (i.e. £23,000 per dwelling compared to Option 1 - £18,900. Option 2 -/ £20,000 and Option 3 - £22.200) while taking into account potential growth beyond 2026. • Members resolved (among other things) to agree Option 2A (as shown by topic paper TP8, Table 3) as the single favoured option to go forward, noting the above reservations and subject to the results of a Planning Inspectorate (PINS) review of the evidence base and approach to the strategy, and the endorsements of the GNDP constituent planning authorities. • It was agreed that a further meeting of the GNDP Policy Group would be held on 19/2/09 to endorse the way forward following the PINS review.
Jan/Feb 2009	Option 2A - PINS Review of evidence	<ul style="list-style-type: none"> • The PINS review Inspector met the GNDP in January 2009, provided draft comments dated 2/2/09, met the GNDP on 12/2/09 and provided a final report received by the GNDP on 17/2/09. (The latter report was circulated at the 19/2/09 Policy Group). • Concerns included the need for an audit trail to demonstrate that the strategy was the most appropriate and the extent to which the consultation work on Options 1, 2 and 3 could adequately inform the evaluation of Option 2A.
19/2/09 GNDP Policy Group	Option 2+	<ul style="list-style-type: none"> • Considered responses to PINS Inspector's concerns including potential courses of action (Agenda Item 6b). • Members were informed of the further studies required to confirm (or not confirm) support for Option 2A and their implications for the JCS and GNDP, and that the quickest way forward to keep to the current timetable would be to pursue an option that reflected the sentiment of Option 2A, but was drawn from current evidence and used the latest housing monitoring information. • A further Option 2+ was tabled at the meeting which met the above criteria (Agenda Item 6). • This option was derived from Options 1 and 2 as shown by the evidence trail in Agenda item 6. • Compared to option 2A, this option excluded Mangreen as it was not part of either Options 1 or 2. The need for a new settlement (here or elsewhere) was considered to be subject to a

			<p>separate full evaluation of the options for future long term growth including new settlements.</p> <ul style="list-style-type: none"> • Agenda Item 6 appended an evidence trail that explained the derivation of Option 2+ compared to Options 1 and 2. • Concerns were raised regarding the Inspector's comments that evidence would be required at Submission that infrastructure providers had agreed to a reasonable prospect of the provision of crucial components at the appropriate time. It was noted that an Infrastructure Study was available and that discussions would be undertaken with infrastructure providers. • Members resolved among other things to agree that Option 2+ would be the single favoured option as a basis on which to proceed to public consultation.
Feb. 2009		X	<ul style="list-style-type: none"> • Sustainability Appraisal of Option 2+
March 2009 – June 2009	Regulation 25 Public Consultation		
25/6/09 GNDP Policy Group	Revised draft JCS		<ul style="list-style-type: none"> • Members considered a revised draft JCS reflecting new policies providing for climate change, design, the environment, and energy • Considered comments from Broadland/South Norfolk Members discussions regarding the Settlement Hierarchy review of villages • Agreed timetable for production of Pre-Submission JCS.
24/9/09 GNDP Policy Group	Draft Pre-Submission JCS		<ul style="list-style-type: none"> • Members considered a draft Pre-Submission JCS revised to reflect Regulation 25 consultation issues and updated evidence • NB: the March 2009 public consultation JCS reflected the favoured Growth Option, but had not been revised to reflect other issues raised during the 2008 technical consultation • Members were informed of all Regulation 25 consultation representations and a high level summary of the consultation issues raised • The updated evidence comprised the Greater Norwich Infrastructure Needs and Funding Study (the EDAW study), the Water Cycle Study (WCS) Stage 2b), the Appropriate Assessment (AA), Norwich Area Transportation Strategy (NATS) strategic transport modelling and the updated SA. • The JCS was revised to clarify the Introduction and the spatial planning objectives, while the policies were re-ordered to place an increased emphasis on climate change, the environment, good design, energy conservation and the protection of local distinctiveness. The policies were reordered to place the generic policies first, followed by the specific policies relating to places. The latter were also revised to take account of the Settlement Hierarchy review (Policy 15 Service Villages and Policy 16 Other Villages). The Implementation Policy was revised to reflect the latest information on the Community Infrastructure Levy (CIL) as supported by an

			<p>infrastructure implementation framework.(Policy 20 and Appendix 7).</p> <p>Members resolved to:</p> <ul style="list-style-type: none"> • support the study findings subject to: clarifications re Loddon and Wymondham re the WCS; the AA subject to Natural England confirmation of the means of resolution of the concerns raised; the EDAW study subject to clarified infrastructure timescales and costs, and delegated officers to project 2021 infrastructure requirements to 2031 and beyond. • agree minor changes to the JCS • approve the JCS as compliant and sound and suitable for pre-submission publication.
November-December 2009	Pre-Submission JCS Publication		<ul style="list-style-type: none"> • Comments invited regarding the “soundness” of the JCS
17/12/09 GNDP Policy Group	Pre-Submission JCS		<ul style="list-style-type: none"> • Considered the JCS update • Welcomed Programme Entry status for the Northern Distributor Road (NDR) • Noted further update of the WCS to be completed and reported to the 28/1/10 Policy Group as part of the JCS Submission report • Members resolved to arrange for GNDP partner LA council/cabinet meetings to sign off the JCS for submission as soon as possible after 28/1/10 Policy Group.
28/1/10 GNDP Policy Group	Proposed Submission JCS		<ul style="list-style-type: none"> • Considered the implications of the pre-submission publication responses, the responses to the emerging additional evidence and the risks attached to JCS submission • Additional emerging evidence included the WCS, the JCS Transport Strategy, the AA, and representations made under Regulation 27 on the JCS publication • Members were informed of impending position statements to be produced by the Environment Agency, Natural England, Anglian Water and the Broads Authority to be available when the GNDP partner LAs considered the JCS Submission. • Resolved that the proposed Submission JCS was sound, and recommended that the partner LAs approve the schedule of proposed minor changes to the JCS and the submission to the Secretary of State of the JCS, subject to the final reports of the WCS and views on it from Natural England, the Broads Authority, the Environment Agency or Anglian Water, and the AA, subject to the views on it of Natural England.
Feb-March 2010: GNDP partner authorities	Submission JCS (Submitted 5/3/10)		<ul style="list-style-type: none"> • Partner authorities approve Submission of JCS to the Secretary of State under Regulation 30 of the Town and Country Planning (Local development) Regulations 2004 • NB: the responses to the Regulation 25 public consultation and receipt of further evidence were not considered to justify further changes to NPA Option 2+.

Location	Evidence for Option 1	Option 1	Evidence for moving from Option 1 to Option 2	Option 2	Evidence for moving from Option 2 to Option 2+	Option 2+ (with revised location descriptions)
Norwich	Strategic Housing Land Availability Assessment	4000	No Change	4000	Revised housing monitoring information updated to 2008	Norwich 3000
Broadland smaller sites	Local knowledge of sites that may come forward. Provide range of size of sites.	2000	No Change	2000	No Change	Broadland allowance for smaller sites and possible additions to named growth locations 2000
South Norfolk smaller	Local knowledge of sites that may come forward. Provide range of size of sites.	2000	No Change	2000	Analysis suggests opportunities for smaller allocations may be more limited.	South Norfolk allowance for smaller sites and possible additions to named growth locations 1800
North East (Sprowston/Rackheath area)	Previous work carried out by Broadland for their core strategy issues and options. JCS issues and options assessment of growth locations.	6000 (rising to 10000 post 2026)	No Change	6000 (rising to 10000 post 2026)	Eco-community at Rackheath will help delivery rates.	Old Catton – Rackheath – Thorpe – St. Andrew Growth Triangle 7000 (rising to 10000 post 2026)
South West (Hethersett/Little Melton area)	A11/B1172 best bus corridor into Norwich. Accessible to strategic employment sites. Location could accommodate large scale growth building on and significantly improving existing services at Hethersett. Scale needed to deliver secondary education. Joint Core Strategy Issues and Options assessment of growth locations.	4000 (rising to 7000 post 2026)	No Change	4000 (rising to 7000 post 2026)	Representations for 2500 at Colney Cringleford within the Norwich Southern Bypass. Limited growth at Hethersett. Reflects political concerns of impacts of large-scale growth on the area. Both locations benefit from the proximity to a good bus corridor and strategic employment sites.	South West Hethersett 1000 Colney/Cringleford 1200
West (Costessey/Easton area)	Close to strategic employment areas On Dereham Road bus corridor Potential to create/enhance centre for Easton	2000	No Change	2000	Focus on Easton (Costessey element in small sites/contingency allowance). Reduced growth eases education capacity pressures.	Easton 1000
Wymondham	Rail Station and A11/B1172 a good bus corridor. A good range of local services and accessible to a range of employment opportunities.	4000 (rising to 5000 post 2026)	Removal of 2000 dwellings lessens impact on historic market town. More complex education solution.	2000	Slight increase recognising potential of Wymondham as a location with local services and strategic employment opportunities and strong public transport opportunities. Education solution remains unclear	Wymondham 2200
Long Stratton		0	Addition of location. Development delivers bypass. Improves strategic route to south A12 corridor. Improves environment of Long Stratton.	2000	Decrease to reflect public responses to the scale of growth in Long Stratton. Funding of the full range of infrastructure and affordable housing requires further analysis as highlighted in the Inspectors' report.	Long Stratton 1800
General Comment	Option that emerged from technical evidence gathering	Total 24000	Benefits to Long Stratton and delivery of unfunded County Council major scheme outweigh poor accessibility to jobs and public transport and the more complex education solution at Wymondham	Total 24000	Delivers less dwelling, reflecting latest monitoring information. Distribution looks to echo the political sentiment whilst remaining reasonably consistent with evidence.	Total 21000

JCS TOPIC PAPER EXTRACT:**Strategy to Accommodate Major Housing Growth in the Norwich Policy Area (Document Ref: TP8)**

6. Evolution of the Favoured Option

Following a series of stakeholder workshops centred on a set of topic papers in summer 2007, the first full-scale consultation on the JCS was the November 2007 Issues and Options. The Issues and Options presented 11 potential locations for 'large-scale essential growth'. A short 'context' and 'initial indications' summary was produced for each potential growth location.

The Issues and Options consultation suggested that (in addition to accommodating a significant level of growth in Norwich), a pattern of development centred on an urban extension North East of Norwich, and new 'country town' South West of Norwich (Hethersett area) and extensions to Wymondham provided 'the better opportunities for larger-scale growth'. The preliminary Sustainability Appraisal supported these locations and suggested the inclusion of the West as a further potential growth location, as considered by the **GNDP Policy Group/ Local Development Framework Working Group on 22 January 2008**. This pattern was agreed as a basis for further progress (and essentially formed the basis of a draft preferred option (which later became Option 1).

Responses to the Issues and Options consultation, plus the results of the initial Sustainability Appraisal and evidence derived from the evidence studies resulted in a draft Preferred Option, which was presented to the **GNDP LDF Working Group on 21st April 2008**. The Preferred Option, which is set out as Option 1 in the table below, sought to: maximise the efficient provision of infrastructure, including high quality public transport; provide good links with strategic employment locations; achieve self containment; and provide opportunities for continued growth post-2026 in three large scale growth locations at Wymondham, Hethersett and the North East, and one medium scale growth location in the West (at Easton/ Costessey).

The draft Preferred Option was the result of the consideration and rejection of other growth options. These included

- the greater concentration of development in a single large new town; rejected for providing for a more limited choice of housing locations with a significant detrimental impact on the housing delivery required within the strategy period.
- The greater dispersal of development in general; rejected for potentially providing for reduced supporting infrastructure, not delivering RSS policy requirements and for performing poorly against the Sustainability Appraisal.
- locations to the north west, north, east, south east, south and Long Stratton; rejected mainly on the grounds of their assessments against

Fringe						
East				1000		
NE Inside and Out	6000	6000	4000	2000		6000
North			4000	2000		2000
Hethersett	4000	4000	4000	2000		
West	2000	2000	2000	1000		
Long Stratton		2000		2000		1500
Poringland				2000		
North West				2000		
Wymondham	4000	2000	2000	2000		2000
Stand Alone					5000*	4500
City %	17	17	17	17	17	17
SNDC %	50	50	42	54	8+	42
Broadland %	33	33	42	29	8+	42
To 2026	24000	24000	24000	24000	13000	24000

* Only 5000 in the plan period the remainder (approx 11000) would be beyond 2026.

The reasoning behind **Option 1** is described above as for the draft Preferred Option. **Option 2** involved a redistribution of growth in Option 1 from Wymondham to Long Stratton, specifically to address the long-standing issue of a bypass for the village; **Option 3** proposed to give an even split of development between Broadland and South Norfolk; **Option 4** involved a wider distribution, covering most of the 11 Issues and Options growth locations; **Option 5** centred around a new settlement in an unspecified location; and **Option 6** retained the stand alone settlement, but at a reduced scale, and focussed the growth in South Norfolk towards the A140 corridor by identifying Mangreen as the settlement location.

The advantages and disadvantages of the options were debated and **it was advised that Options 3, 4 and 5 should be rejected**, as they did not perform well against a “sustainability test” which appraised the options against detailed criteria, but was not a full Sustainability Appraisal at this stage. Particular concerns were also raised about the prospect of delivering infrastructure under the wider dispersal in Option 4 and the fact that Option 5 failed to deliver sufficient housing in the JCS period. It was concluded that further work be undertaken to appraise Options 1, 2 and 6, particularly as Option 6 had not been evaluated to the same degree as the others proposed. This further work would be considered by the GNDP Policy Group on 24th June 2008.

Officer concerns were raised about the inclusion of the North as a growth location in Option 6. These included its lack of potential for sustainable travel, the potential travel generation dependent upon a Northern Distributor Road (NDR), and a lack of knowledge of the untested impacts of the proposed growth to the North on the NDR which would have required significant additional investigation. Consequently an alternative option was produced which redistributed the growth proposed for the North equally between the

“Broadland Smaller Sites” and the West (i.e. Easton/Costessey). This option was called Option 6a. As Option 1 had already been subject to a Sustainability Appraisal, Options 2, 6 and 6a were evaluated through a “sustainability test” involving detailed comparisons. Option 6 performed the least well and was rejected in favour of Options 1, 2 and 6a. These options were renumbered Options 1, 2 and 3 for consideration at the following Policy Group meeting on 24th June 2008. (The distribution of growth for Option 6a was therefore as shown for Option 3 in Table 2 below).

The **GNDP Policy Group on 24th June 2008** was advised that new Town and Country Planning Regulations governing Local Development Frameworks would come into effect on 27th June. As such, the previously planned Preferred Options stage would no longer be applicable; however, this meant that there was now the opportunity to undertake wider consultation on the three options still under consideration. It was agreed that a draft document for consultation with ‘specific and general consultation bodies’, plus a newsletter for the wider public, be agreed by a meetings of the GNDP member Cabinets/Executives on 18th July 2008. In parallel the GNDP would continue to gather evidence about the three remaining options. The three options to be considered in this consultation were as derived above and shown in Table 2, with no indication of preference:

Table 2

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

Following the **GNDP Policy Group on 18th July 2008** and meetings of the Cabinets/Executives of the constituent authorities immediately following the Policy Group, the above Options were agreed for a Technical Consultation starting in August 2008 in accordance with the requirements of new Regulation 25.

During the autumn of 2008, the results of the Annual Monitoring Reports produced by the GNDP partner authorities showed a fall in the number of

potentially deliverable new homes from allocations in Norwich, while house completions were declining in Broadland and rising in South Norfolk. The opportunity was taken therefore to revise and update the calculation of the housing requirement in the JCS (i.e. the amount for which allocations need to be made) from a 1st April 2006 to 1st April 2008 base date. The result was a reduction in the size of the housing allocation in the NPA from 24,000 units to 21,000, including a reduction of the remaining capacity in Norwich from 4,000 to 3,000 units.

The **GNDP Policy Group of 18th December 2008** considered the outcomes of the Technical Consultation, which had involved 1,250 technical experts, developers, service providers and community groups, plus the further supporting evidence that had been gathered/received plus sustainability appraisals of the three options. The proposal at the meeting was for Members to agree a *Favoured Option* for growth in the NPA to be distributed for a full public consultation, including re-consultation with the 'Technical' consultees, and for the public to also be given the opportunity to comment on the other issues in the earlier 'Technical Consultation' document.

At the meeting the officer recommendation was that the evidence suggested that Option 1 should be the Favoured Option. South Norfolk Council tabled a further Option, a hybrid of Options 2 and 3, labelled 2A, as set out below, which took on board the updated housing baseline:

Table 3

Location	Option 2A (Dwellings)
Norwich	3,000
Broadland smaller sites	2,000
South Norfolk smaller sites	1,800
North East (Sprowston/Rackheath area)	7,000
South West: Hethersett/Cringleford)	1,000/1,200
South (Mangreen)	0 (2,000 additional allocation pre-2026)
Wymondham	2,200
West (Costessey/Easton area)	1,000
Long Stratton	1,800
TOTAL	21,000 (plus 2,000 at Mangreen)

(It should be noted that while Table 3 is shown as presented to the 18/12/08 Policy Group, the intention to provide for development at Mangreen prior to 2026 should have been represented by an overall total of 23,000 dwellings to 2026).

Advance notice of Option 2A had been given and a summary of the advantages and disadvantages was presented to the meeting; these concluded that the Option was a better fit with the existing settlement character and pattern of South Norfolk, but also that it presented significant challenges that would need to be pursued if this option was taken forward.

The meeting was also informed that the Planning Inspectorate (PINS) had offered to undertake a pre-submission review, which could be carried out in late January 2009. The meeting therefore resolved to agree Option 2A, subject to (a) endorsement by the constituent planning authorities, (b) the results of the PINS review giving confidence about the evidence base and (c) a further meeting of the GNDP Policy Group following the PINS review.

The PINS Review was undertaken in late January 2009 and a report issued in draft on 2nd February 2009. This was followed by a final version received by the GNDP on 17th February 2009. The issuing of the draft report enabled the early consideration of the issues raised in preparation for the next meeting of the GNDP Policy Group on 19th February 2009.

The outcomes of the PINS Review were presented to the **GNDP Policy Group on 19th February 2009**. In response to the PINS concerns about the evidence base used to support Option 2A, Members were informed of the further studies that would be required to confirm support for Option 2A and the implications for the JCS production timetable. They were also informed that an appropriate course of action would be to consider an option that reflected the sentiment of Option 2A, but was drawn from current evidence and was based on the updated housing base date information.

Therefore a further revision, Option 2+, was proposed which met the above criteria. The timing of the PINS draft report of 2/2/09 had enabled the development of an alternative growth option intended to address the PINS concerns prior to the GNDP Policy Group meeting on 19th February 2009. While bearing a similarity to Option 2A, Option 2+ was shown to be clearly derived from Options 1 and 2 as shown by an evidence audit trail produced for that Policy Group meeting in response to the PINS pre-submission review.

This option did not provide for a new settlement at Mangreen, which had not formed part of either Options 1 or 2. However it was agreed that additional work would be undertaken to evaluate the potential of a new settlement to accommodate any further development in the NPA, beyond the current JCS requirements. It was also agreed that Option 2+ would be the single favoured option to form the basis on which to proceed to public consultation.

Option 2+ was consulted on therefore as the “Favoured Option” in the Regulation 25 Public Consultation carried out between March and June 2009.

Subsequent meetings of **the GNDP Policy Group** considered provisional new policies (**25th June 2009**), and a draft Pre-Submission JCS (**24th September 2009**) which had been revised to reflect Regulation 25 consultation issues and updated evidence availability. Among other things, the revised strategy improved the policy emphasis on climate change, environmental and design provisions, and revised growth provisions for villages arising from a Settlement Hierarchy review, but did not alter the distribution of growth proposed for the NPA by the Favoured Option. The Favoured Option was therefore retained in the Pre-Submission version of the JCS. This was

published for public comment during November-December 2009, and the Proposed Submission JCS considered by the **GNDP Policy Group on 28th January 2010**, and recommended for submission by the GNDP partner local authorities. The results of evidence studies which had continued to be received did not suggest reasons for changing the NPA proposed distribution of growth.

Summary of the derivation of the “Favoured Option” (i.e. Option 2+)

The Favoured Option was derived from the original draft Preferred Option (subsequently referred to as Option 1) and Option 2, which was both similar to and considered to be a very reasonable alternative to Option 1. For this reason, Option 2 continued to receive a favourable consideration in relation to the development of alternative options until a late stage in the growth option development process. The relationships between Options 1, 2 and The Favoured Option (Option 2+) are shown in Table 4 and summarised below.

Table 4

Location	Dwellings		
	Option 1	Option 2	Option 2+
Norwich	4,000	4,000	3,000
Broadland smaller sites	2,000	2,000	2,000
South Norfolk smaller sites	2,000	2,000	1,800
North East: Sprowston/Rackheath area	6,000	6,000	7,000
South West: Hethersett/ Lt. Melton Hethersett/Cringleford	4,000	4,000	1,000/ 1,200
South: Mangreen			
Wymondham	4,000	2,000	2,200
West: Costessey/ Easton area	2,000	2,000	1,000
Long Stratton		2,000 (to help to deliver a bypass)	1,800
Total	24,000	24,000	21,000

Option 1 provided for a distribution of growth that performed well within the context of the Issues and Options consultation, the evidence studies and the Sustainability Appraisal (as reviewed by independent consultants in May/June 2008). It provided for most of the RSS housing requirements in the Norwich Policy Area (NPA) in a limited number of large mixed use communities that would aid the provision of the necessary infrastructure, services and facilities. The option was designed to ensure the ease of access to services and

facilities, while balancing the proposed growth areas' sizes and distribution with their ability to deliver the required housing and to meet housing market demands. The proposed provisions for sustainable development were also intended to meet the RSS requirement (since revoked) for a major shift in emphasis across the NPA towards travel by public transport.

The north east – south west/west emphasis on growth locations reflected their ease of access to strategic employment locations, their accessibility via good transport links and the potential for improved transport infrastructure. This would include a Norwich Northern Distributor Road and improved public transport including bus rapid transit.

Option 2 provided for a distribution of growth that was largely identical to Option 1 and considered to generally perform well in the Sustainability Appraisal (as reviewed by independent consultants in September/October 2008). This option proposed 2000 dwellings at the additional growth location of Long Stratton to help to deliver a bypass and its environmental benefits for the village which had been important long term objectives for both South Norfolk Council and Long Stratton parish council. A bypass would also provide an improvement to an important strategic road link to Suffolk and the A12 to London and the south east. The inclusion of new housing provisions for Long Stratton provided an opportunity to respond to concerns about the adverse impact of the previously proposed (Option 1) level of growth on the form and character of Wymondham, by providing for an equivalent total reduction in its proposed housing provisions to balance the new provisions for Long Stratton.

Overall Option 2 was considered to be a reasonable alternative to the original preferred option (Option 1) as derived from the Issues and Options consultation.

The Favoured Option (Option 2+) provided for a broadly similar geographical distribution of housing provisions to that in Option 2, albeit with adjustments to the distribution of housing totals between some of the locations. These adjustments reflected the revised and reduced total new housing requirements to 2026 from a revised base date of 2008, which resulted from updated housing development monitoring, plus political concerns and form and character considerations.

The main difference between Option 2+ and Options 1 and 2 was the reduced total dwelling provision for 21,000 dwellings arising from the updating of the JCS housing requirement base date to 2008. When compared to Option 2, this was reflected in significantly reduced housing provisions for the growth locations of Norwich, the South West and West, reduced respectively for reasons of revised housing monitoring information, a sustainable alternative location allied to political concerns, and form and character considerations allied to the easing of education capacity pressures.

A significant difference was the relocation of some of the provisions for the South West from the Hethersett/ Little Melton area to Hethersett and Cringleford. The choice of Cringleford reflected its good sustainable location

within the South West general growth area, as it was well placed in relation to the A11 transport corridor with good public transport links and easy access to strategic employment locations, including the Norwich Research Park. Its potential for development had also been identified from favourable consultation responses. This redistribution also reflected political concerns about the adverse impact on the separation of settlements and their character of the potential Options 1 and 2 growth provisions for the Hethersett/ Little Melton area.

Growth provisions elsewhere were reduced very slightly in relation to the South Norfolk Smaller Sites in the NPA, as evidence had suggested potentially limited opportunities for site allocations. Growth provisions for Long Stratton were also slightly reduced, to reflect public responses to the proposed scale of growth, albeit subject to further analysis of the funding of the full range of infrastructure and affordable housing. The proposed slight decrease at Long Stratton was balanced by a slight increase at Wymondham. This reflected the latter settlement's services, strategic employment opportunities and strong public transport opportunities, albeit its potential secondary education provision solutions remained unclear.

Finally the provisions for the North East were increased slightly to assist the delivery of the proposed eco-community at Rackheath.

The February 2009 Sustainability Appraisal for "The Public Consultation Favoured Option" (i.e. based on Option 2+), referred to its generally positive impacts. However it also expressed uncertainties regarding the impact of the dispersed pattern of growth in South Norfolk on secondary education provision, and uncertainties regarding the funding of the Long Stratton bypass and its possibly negative impact on the funding of other infrastructure. However it also considered that the scale of growth in Long Stratton was a small proportion of the overall requirement across the strategy area and in itself did not have a significant effect on the sustainability of this growth option.

The subsequent SA of the pre-Submission JCS Policy 9 "Strategy for growth in the Norwich policy Area" also questioned the impacts of the dispersed pattern of growth in South Norfolk on the ability to provide in the short term for services and facilities, and its impacts on the development of sustainable patterns of transport. The relative isolation of Long Stratton in particular was queried in relation to its accessibility to strategic employment locations and lack of potential to provide for a bus rapid transit service. However Long Stratton was also judged to have a good range of existing services, facilities and employment opportunities which would be enhanced in association with the proposed housing development. Many benefits of the overall growth option were also apparent, and there was little to suggest that there would be any significant effects on existing communities that could not be addressed or mitigated.

The pre-Submission JCS Policy 12 "Locations of major new or expanded communities in the Norwich Policy Area" SA identified the necessary requirements to achieve sustainable patterns of development and transport

while mitigating for the potential negative effects of the proposed growth. The SA raised issues relating to the mixed impacts of the strategy on reducing traffic impacts, and uncertainties regarding the provision of secondary education and bus rapid transit for locations in South Norfolk in particular. It also raised location and accessibility issues related to Long Stratton, but recommended that these could be overcome by the development of a bespoke vision to achieve a degree of self containment for Long Stratton.

Overall, Option 2+ was considered to meet the concerns of the PINS Inspector expressed in relation to previous Option 2A, and the perceived lack of clear reasoning to support that option. Option 2+ can be seen to be derived from the previous Options 1 and 2 which were respectively the previous Preferred Option and a highly regarded reasonable alternative option that were supported by the results of consultations, study evidence and the Sustainability Appraisals. The sustainability appraisals have referred to the generally positive impacts of growth Option 2+, and any uncertainties raised by the sustainability appraisals and the background evidence will be addressed by the appropriate mitigations to ensure that the proposed distribution of growth remains “sound”.

GNDP response to the Inspector’s requirements arising from the Joint Core Strategy (JCS) Exploratory Meeting of 13 May 2010.
3) The distribution of development, particularly in relation to public transport opportunities

Sustainability Appraisal (SA) iterations, outcomes and mitigations

JCS Stage	JCS elements subjected to SA	SA summary and conclusions
<p>Issues and Options Consultation Report November 2007</p> <p>(SA of issues and Options Stage – Examination in Public documents list Ref: EIP 12).</p>	<p>Question 11): Different strategies for locating growth – Options: a) Widespread dispersal on small sites b) Medium concentration (1500-3000 units) c) Larger scale urban extensions and new settlements (5000-10000 dwgs).</p>	<p>The overall summary stated: “This is a fundamental aspect of strategic growth as it will change the face of the area and have lasting effects well into the future. It will determine to some extent the viability of even more development after this planning period, so it is crucial that the effects are understood.</p> <p>Further research would be especially important in this regard to determine the constraints, opportunities and drawbacks fro each possible growth location.</p> <p>A combination of the three strategies could also work quite effectively in the future. This would help to secure that some aspects of rural communities remain viable in the future whilst new facilities can be provided to serve new communities , or residents in existing areas can benefit from improvements brought about by new development, such as improved ranges of housing, public transport, new jobs provision and cultural attraction.”</p>
<p>Issues and Options Consultation Report November 2007</p>	<p>Question 12): The effects of the spatial growth location options (with reference to Appendix 4 of the consultation report).</p>	<p>The Issues and Options consultation report Appendix 4 showed the opportunities and constraints associated with twelve potential growth locations which included a potential village extension to Long Stratton</p> <p>The SA showed the effects of development at all twelve locations in a colour coded table which assessed their benefits and constraints compared to JCS Objectives. This was followed by a schedule showing the key sustainability issues associated with each location, and a further</p>

		<p>colour coded table evaluating each location against the SA Objectives.</p> <p>No conclusions were drawn by the SA regarding the choice of particular locations. The summary table of key sustainability issues associated with each location referred to a Long Stratton extension requiring a new identity and additional services, while being poorly related to employment areas with few public transport expansion options. However the potential to be able to expand the (high) school was identified.</p>
<p>Issues and Options Consultation Report November 2007</p>	<p>Question 13): Five options for large scale growth outside the Norwich city boundary –</p> <p>a) Concentration on NE and SW of Norwich plus Wymondham.</p> <p>b) as a) plus a fourth location for large scale growth</p> <p>c) as a) plus two more locations for large scale growth</p> <p>d) a different combination of major growth options</p> <p>e) a more dispersed pattern of growth (perhaps an</p>	<p>The overall summary stated: “These are a complicated set of options because so many effects are dependent on the local circumstances of areas that could be considered for growth. The main benefits of a concentrated approach are that, with attention to design, local features can be added into a development and public transport and other services become more viable if they can serve a larger critical mass of households. Dispersed growth may be easier to integrate into the existing landscape and established society, but it could bring strain to health and education facilities, and could leave those dependent on public transport more vulnerable to social exclusion. Environmental effects are hard to quantify, and further research could benefit from water cycle studies and infrastructure capacity assessments. Cumulatively, more dispersed growth could have a gradual effect of changing the landscape and character of an area over time, whereas concentrated growth could help to maintain some characteristics and provide opportunities for integrated and environmentally-friendly designs.”</p>

	average of 1500 dwellings in ten locations)	
Issues and Options Consultation Report November 2007	<p>Question 32): Transportation – Growth at Long Stratton and a potential bypass Options;</p> <p>a) major mixed use growth as a means of securing strategic improvements to the A140.</p> <p>b) no promotion of growth to achieve A140 improvements.</p>	<p>Cumulatively, Option a) would work with a concentrated approach to development locations, promotion of rural employment and public transport measures, and strategies that sought to increase the provision of affordable housing in new developments.</p> <p>It is important to bear in mind that large scale development may not automatically lead to the construction and delivery of the proposed bypass as a there are many other factors involved, and its provision would only be realised in the long term anyway. There are many impacts that could arise if large scale development were to take place without the bypass, such as increased congestion, slower and less reliable public transport and more impacts from cars and traffic on the landscape and built heritage. Although there may be more employment included within any large scale mixed growth, this would also lead to more commuter traffic. With all the large scale growth, climate change mitigation and adaptation effects will only be positive if ambitious and innovative sustainable design and construction measures are implemented for example.</p>
<p>Regulation 25 Consultation</p> <p>(SA of Regulation 25 Consultation– Examination in Public documents list Ref: EIP 14).</p>	<p>Long Stratton including bypass</p>	<p>Environmental Impacts:</p> <p>The provision of a bypass allied to growth in Long Stratton would improve conditions for existing residents. Increased local traffic from new homes and jobs, distance to Norwich and poor prospects for sustainable travel to Norwich score against the location and is an average performer compared to the other options.</p> <p>Social Impacts</p> <p>Long Stratton has a good range of existing local services that would be strengthened by growth. The development is unlikely to be able to self fund the target number of affordable homes and/or contribute to the necessary infrastructure because of the cost of the bypass. Performs poorly compared to other locations. There will be some local and wider benefits from the improvements to the A140.</p> <p>Economic Impacts</p> <p>This location is not well related to strategic employment locations. Significant growth might</p>

		<p>stimulate local employment growth but it would be remote from existing sector concentrations.</p> <p>Overall summary:</p> <ul style="list-style-type: none"> • Impacts • Possible mitigation measures • Recommended further research • Considering cumulative impacts <p>Growth can build on local jobs and services and strengthen the village's economy. A bypass brings local and strategic benefits on the A140 corridor; however it may come at the price of not providing target levels of affordable housing. Long Stratton is the most distant growth location from Norwich and is poorly related to strategic employment opportunities. There is limited ability to deliver fast, frequent high quality public transport connections to key destinations in the Norwich Policy Area. Overall Long Stratton is a location that scores averagely.</p>
<p>Regulation 25 Consultation</p>	<p>Growth Option 1</p>	<p>Environmental Impacts:</p> <p>This option maximises opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is an advantage in relation to option 2, and significantly more than option 3. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A focus for some of the major growth on the A11 corridor in this option could have potential significant impacts on European sites if the effects are not fully mitigated but the overall strategy also provides for significant enhancement to habitats and green infrastructure. Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of green field land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</p> <p>Social Impacts</p> <p>Social aspects score very positively, although the main focus will be on new residents in the areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in designing the new communities in a 'masterplanning' exercise to ensure effective delivery.</p> <p>Economic Impacts</p> <p>The policy scores very positively. It performs a little better than option 2, and better than option 3 in promoting growth that is well-located in relation to, and supports key strategic employment</p>

		<p>locations and associated sectors.</p> <p>Overall summary:</p> <ul style="list-style-type: none"> • Impacts • Possible mitigation measures • Recommended further research • Considering cumulative impacts <p>Policy generally performs very well against sustainability criteria. Some improvement to policy wording required to make the implicit explicit.</p> <p>Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy.</p> <p>Need to investigate:</p> <ul style="list-style-type: none"> • strengthening consideration of landscape impacts • and potential for innovative use of the railway.
<p>Regulation 25 Consultation</p>	<p>Growth Option 2</p>	<p>Environmental Impacts</p> <p>This option redistributes some growth in south Norfolk and makes less use of the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is a disadvantage in relation to option 1 but better than option 3. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A reduced focus for some of the major growth on the A11 corridor in this option could have marginally less potential for significant impacts on European sites if the effects are not fully mitigated. This strategy overall also provides for significant enhancement to habitats a green infrastructure.</p> <p>Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive.</p> <p>The scale of growth in Long Stratton is a small proportion of the overall requirement across the</p>

		<p>plan area and while locally significant particularly on the regionally important A140 corridor, in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements from a bypass.</p> <p>Social Impacts Social aspects score very positively, although the main focus will be on new residents in the areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in designing the new communities in a ‘masterplanning’ exercise to ensure effective delivery. Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p> <p>Economic Impacts The policy scores very positively. It performs a little worse than option 1, but, better than option 3 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors. The Long Stratton Bypass will improve strategic access along the A140 and may give a local boost to Long Stratton.</p> <p>Overall summary:</p> <ul style="list-style-type: none"> • Impacts • Possible mitigation measures • Recommended further research • Considering cumulative impacts <p>Policy generally performs well. Growth in Long Stratton not ideally located for strategic employment sites and is over 10 miles from Norwich city centre. The need to fund a bypass may divert investment from other areas and infrastructure needs although it will improve strategic access. Education solutions for high schools in Long Stratton and Wymondham are compromised. Uncertainty over the funding of a Long Stratton bypass could have consequent impacts on provision of and access to other social infrastructure also negatively impact in this way. Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy. Need to investigate:</p> <ul style="list-style-type: none"> • strengthening consideration of landscape impacts
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		<ul style="list-style-type: none"> • and potential for innovative use of the railway.
Regulation 25 Consultation	Growth Option 3 (i.e. ex-Option 6a)	<p>Environmental Impacts</p> <p>Overall beneficial, but may not easily achieve the high quality public transport system necessary to limit CO2 emissions and manage travel demand from the planned scale of growth. This option would redistribute growth in South Norfolk more than option 2 and, apart from growth at Wymondham, would not use the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is a disadvantage in relation to options 1 and 2. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A much reduced focus for some of the major growth on the A11 corridor in this option may avoid potential for significant impacts on European sites. This strategy overall also provides for significant enhancement to habitats and green infrastructure.</p> <p>Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive.</p> <p>The scale of growth in Long Stratton is a small proportion of the overall requirement across the plan area and while locally significant particularly on the regionally important A140 corridor, in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements from a bypass.</p> <p>Social Impacts</p> <p>Overall beneficial, but some development not accessible to larger centres and services. Dispersed transport and education infrastructure costly and will impact on the ability to provide other essential infrastructure and affordable housing.</p> <p>Social aspects score very positively, although the main focus will be on new residents in the</p>

		<p>areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in designing the new communities in a ‘masterplanning’ exercise to ensure effective delivery.</p> <p>Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p> <p>Economic Impacts</p> <p>Uncertainty over the timing and impact of promoting a further strategic employment site. The policy scores very positively. It performs worse than options 1 and 2 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.</p> <p>The long Stratton Bypass will improve strategic access along the A140 and may give a local boost to Long Stratton.</p> <p>Overall summary:</p> <ul style="list-style-type: none"> • Impacts • Possible mitigation measures • Recommended further research • Considering cumulative impacts <p>Generally positive impacts. Score held down by the ability to provide high quality public transport, the costs of infrastructure and the consequent impacts on provision of and access to other social infrastructure. Uncertainty over the funding of a Long Stratton bypass could also negatively impact in this way.</p> <p>Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy.</p> <p>Need to investigate:</p> <ul style="list-style-type: none"> • strengthening consideration of landscape impacts • and potential for innovative use of the railway. • Environmental Consequences of implementing public transport priority and the scale of enhancements on A140 in the city.
<p>Regulation 25 Consultation</p>	<p>Growth Option 2A</p>	<p>Following the Regulation 25 Technical Consultation, this option was developed and assessed prior to the Regulation 25 Public Consultation. However it is not summarised here as it was replaced and did not form part of the basis of the Favoured Option (i.e. Option 2+ referred to</p>

<p>Regulation 25 Consultation</p>	<p>Growth Option 2+ (The Favoured Option)</p>	<p>below) in the Submitted Joint Core Strategy.</p> <p>Environmental Impacts</p> <p>Firstly, it is important to point out that this option promotes a lower scale of growth compared to options previously considered. This decrease in scale is significant enough to reduce the likelihood or magnitude of environmental impacts.</p> <p>Another important characteristic of this option, with environmental implications, is that it may be relatively difficult to achieve the high quality public transport system necessary to limit CO2 emissions and manage travel demand. This option would redistribute growth in South Norfolk more than options 1, 2 and 3, and, compared with options 1 and 2, would not make such good use of the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure on the approach to Norwich. However, related to this, a reduced focus on the A11 corridor may avoid potential for significant impacts on European sites.</p> <p>This option does, however, promote growth to the north east, which will benefit from choice and flexibility about how to manage travel demand by bus car and rail.</p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive. However, the scale of growth in Long Stratton is a small proportion of the overall requirement across the plan area, and while locally significant (particularly on the regionally important A140 corridor), in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements from a bypass.</p> <p>Social Impacts</p> <p>Overall beneficial, but some development would not be accessible to larger centres and services. There would be some dispersal of transport infrastructure compared with option 1 and this is likely to be more costly. It will also impact on the ability to provide other essential infrastructure and affordable housing, but less so than options 2a and 3. There is no single and obvious solution to meet the secondary education need of the more dispersed pattern of growth in South Norfolk. In this respect the option has uncertain educational consequences.</p> <p>Social aspects score very positively, although the main focus will be on new residents in the areas indicated. The strategy would ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. It also requires community engagement in designing the new communities in a</p>
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		<p>'masterplanning' exercise to ensure effective delivery. In South Norfolk this option builds on existing communities and offers the opportunity for new growth to both draw on existing community facilities and activities and end enhance the facilities available to the existing residents and businesses.</p> <p>Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p> <p>There would be fewer new homes and this lower level of growth reduces the capacity to fund and deliver as much infrastructure, and community services and facilities than with options 1, 2 or 3. This is considered a negative potential impact.</p> <p>Economic Impacts</p> <p>Although the sustainability appraisal of economy policy scores very positively, the appraisal of the option performs worse than options 1 and 2 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.</p> <p>The Long Stratton Bypass will improve strategic access along the A140 and may give a local boost to Long Stratton.</p> <p>Overall summary:</p> <ul style="list-style-type: none">• Impacts• Possible mitigation measures• Recommended further research• Considering cumulative impacts <p>Generally positive impacts. A number of benefits arise from the reduced scale of allocation. Score held down by the dispersed pattern of smaller scale growth in South Norfolk being less able to deliver local jobs and services, however the grouping of the smaller growth locations along the A11 corridor maximises their ability to provide high quality public transport.</p> <p>Uncertainty over the funding of a Long Stratton bypass and its impacts on other infrastructure provision could also negatively impact.</p> <p>Implementation of sustainable transport infrastructure and services will be important, as this is important to help combat the effects of climate change by reducing CO2 from transportation, and therefore help to mitigate the negative environmental impacts of growth. This requirement is also emphasised in the regional spatial strategy.</p> <p>Need to investigate:</p> <ul style="list-style-type: none">• potential for innovative use of the railway.• Secondary education solution
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<p>Pre-Submission JCS</p> <p>(SA of – Pre-Submission JCS Examination in Public documents list Ref:JCS 3).</p>	<p>Policy 9) Strategy for Growth in the Norwich Policy Area (NPA)</p>	<p>Overall environmental effects</p> <p>Mixed effects are predicted in terms of objective ENV1 (sustainable transport), ENV6 (climate change) and ENV9 (as a result of the likelihood of both greenfield and brownfield development). Negative effects are predicted in terms of ENV8, in order to highlight the fact that growth in a water stressed part of the country will lead to further pressure being placed on water resources. Positive effects are predicted in terms of other environmental objectives.</p> <p>Overall social effects</p> <p>Mixed effects are predicted in terms of a number of social objectives related to the fact that, although the scale of growth at the North East Growth Area is of a scale where the delivery of community infrastructure can be guaranteed, the more dispersed nature of growth promoted in South Norfolk leaves a number of questions-marks. Some benefits may not be realised in the short-term as services and facilities may have a considerable lead-in time.</p> <p>Overall economic effects</p> <p>This spatial growth strategy performs strongly in terms of economic objectives, although it is noted that in Long-Stratton housing growth may be promoted in an area that does not have access to a strategic employment location.</p> <p>Overall summary of effects</p> <p>One of the key implications of this Policy relates to the potential for this spatial strategy to support sustainable patterns of transport and travel. Growth will clearly have implications for the amount of travel and traffic in the Sub-Region. It is clear that some aspects of the spatial approach promoted through this Policy has been developed with the objective of allowing more sustainable patterns of travel at the forefront. However, the effects of some aspects of the strategy in terms of this objective are more questionable.</p> <p>There is a need to understand the specific proposals for sustainable access and transport before a judgement can be made regarding the overall performance of the growth strategy in terms of this objective.</p> <p>At this stage, however a question is raised as to whether the dispersed nature of growth promoted in South Norfolk (as opposed to Broadland, where growth is focused at North East Norwich only) and the isolated nature of Long-Stratton in particular, will preclude the opportunity</p>
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		<p>for the new development to lead to sustainable patterns of transport. Long-Stratton is remote from Norwich and it will not be possible to provide a Bus Rapid Transit Service (discussed further under Policy 12). Furthermore, it does not appear that Long-Stratton is well linked to a strategic employment location (Hethel is located about 6 miles away).</p> <p>This issue relating to Long Stratton has been highlighted through previous iterations of the Sustainability Appraisal (and so can be seen to have been considered as part of previous consultations). Having pointed out the limitations of Long Stratton, however, it is important to point out that for a village of its size there is a good range of existing services, facilities and employment opportunities, and that that this range will see ancillary growth as part of the housing-led growth strategy.</p> <p>The appraisal has also highlighted that there is potential for the quantum of development proposed by this Policy to result in negative effects in terms of some <u>environmental objectives</u>, but at this stage there is little evidence to suggest that this particular spatial growth strategy will lead to significant effects that cannot be mitigated. In terms of biodiversity effects it is thought that implementation of the Green Infrastructure Strategy should ensure that negative effects are mitigated, and there should, in fact, be some benefit to promoting access to nature and the countryside as well as promoting a more proactive approach to conservation. The appraisal has highlighted that one environmental effect that cannot be fully mitigated is the impact of increased abstraction on water resources (although impacts are partially mitigated by requiring water efficiency measures in all new buildings).</p> <p>In terms of effects on <u>social objectives</u> it is thought that the quantum of growth will lead to broad benefits.</p> <p>However, some effects are predicted to be mixed as the smaller growth locations in South Norfolk will struggle to bring forward the same level of local services and facilities that can be brought forward at the North East Growth Area.</p> <p>There is little to suggest that there will be significant effects on existing communities that cannot be addressed and mitigated. There will be some potential to target development in Norwich at areas that are in need of regeneration (i.e. there are existing issues of deprivation). However, this spatial strategy is primarily focused on maximising opportunities for sustainable growth, rather than regeneration.</p> <p>It is also important to point out that developing new communities in these locations with an emphasis on sustainable movement patterns and implementation of the Green Infrastructure</p>
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		<p>Strategy should mean that walking, cycling and outdoor recreation are encouraged, which will have benefits in terms of the health of the population.</p> <p>In terms of <u>economic effects</u>, this Policy promotes strategic employment growth at a number of locations that have been chosen for their potential to support growth in key sectors (in line with Policy 6), as well as being well connected to Norwich, major growth locations and the wider region. It is thought that the growth and supporting infrastructure promoted through this Policy should, on the whole, help to support a shift towards a knowledge based, yet diverse economy for the Sub-Region. This will be an important factor in terms of solidifying the image of Norwich as being forward thinking and supportive of a sustainable form of growth.</p> <p>Recommendations N/A</p>
<p>Pre-Submission JCS</p>	<p>Policy 12) Locations of major new or expanded communities in the Norwich Policy Area (NPA)</p>	<p>Overall environmental effects The detail set out in this Policy should help to ensure that potential negative environmental effects of development are avoided or mitigated, and should also help to make the most of a range of opportunities. For each of the major growth locations the Policy identifies what must be put in place in order to achieve sustainable patterns of travel and transport. However, effects in terms of objective ENV1 (To reduce the effect of traffic on the environment.) are predicted to be mixed because it is thought that some growth locations perform better than others.</p> <p>Overall social effects It is thought that the detail set out in this Policy should help to ensure that social benefits associated with growth at these locations are maximised. However, effects are predicted to be mixed for SOC3 and SOC8 (access to services and facilities) because it is noted that uncertainties remain regarding meeting the need for local secondary school capacity. Similarly, effects are predicted to be mixed for SOC4 (housing) and SOC6 (employment) because it is thought that some growth locations perform better than others.</p> <p>Overall economic effects The success of these major growth locations is important in terms of supporting sustainable economic growth in Greater Norwich. Thus, it is thought that the detail set out in this Policy should indirectly lead to economic benefits.</p> <p>Overall summary of effects Although some of the implications of the spatial approach to growth have already been considered as part of the appraisal of Policy 9, this Policy allows sustainability implications to be considered with a greater degree of certainty (as this Policy describes <i>how</i> growth will come</p>

	<p>forward, and not just <i>where</i>).</p> <p>One of the key roles of this Policy is to identify what must be put in place in order to achieve sustainable patterns of travel and transport. For the North East Growth Triangle a number of ambitious proposals appear to be agreed and settled upon in principle, and it seems that it will be possible to achieve a major shift away from car dependency for residents here. However, this will require much on-going work and commitment. If suitably ambitious measures are implemented then it may be wrong to assume that access to a major orbital road – the proposed NDR – ‘on the door-step’ of the development will lead to on-going car dependency.</p> <p>At Wymondham the Policy describes a number of schemes that will allow many people to reduce their car dependency, but there remains considerable uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich. Without this commuting by car will be more prevalent.</p> <p>At Hethersett and Cringleford proposals revolve around enhanced cycle routes to a number of key destinations as well as enhanced bus services. Both of these are likely to be measures that can encourage many people out of their cars (bearing in mind that proximity to Norwich will make the bus a more attractive option). There is an even greater deal of uncertainty regarding the potential for a Bus Rapid Transit Service into Norwich from Cringleford and Hethersett, as it could be that a service would only be viable if, travelling from Wymondham, it stopped at one or the other. Similarly, at Easton/Costessey there is a commitment to deliver enhanced bus routes and cycle routes to a number of key destinations. It also appears that the Policy commits to delivery of a Bus Rapid Transit Service. This will have the effect of development at this location potentially being able to match that at the North East Growth Triangle in terms of promoting sustainable transport patterns. However, it is important to note that the viability of this service is dependent upon other development coming forward along the Dereham Road corridor, which is beyond the control of the Core Strategy (i.e. as not part of the major growth location there could be less impetus behind it and thus less certainty).</p> <p>At Long-Stratton there are serious question-marks relating to the potential for sustainable transport due to the isolation from higher order centres and major employment locations. This Policy does little to allay any fears. There is a specific commitment to bus priority at the A140/A47 junction, which is to be welcomed, but also a more general reference to creating an ‘enhanced route’. Long-Stratton is about 12 miles from Norwich, and so there is a need for more specific commitments as to how this will be made a journey that encourages people out of their cars. There is also scant reference to access to</p>
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		<p>major employment locations from Long Stratton. The supporting text acknowledges that “<i>While Long Stratton is not as well related to employment or high quality public transport this is outweighed by the availability of a good range of local services and the significant local benefits of a development-led bypass.</i>”</p> <p>For each of the locations, the Policy sets out to identify strategic priorities that take account of the constraints and opportunities provided by the local landscape, heritage and biodiversity baseline. For each of the major growth locations, with the exception of Cringleford, the Policy takes account of local priorities and promotes a bespoke approach for delivering the aims of the Green Infrastructure Strategy and protecting and enhancing environmental assets more generally. This is thought to be a well considered and proactive approach that can feed through into more detailed plan-making. For a number of major growth locations the Policy also takes account of local landscape constraints and opportunities. For example, the Policy recognises the importance of the ancient landscape to the east of Long Stratton, and north of Wymondham creating a “Ketts Country” pastoral landscape of grass, wood, hedgerow and wetland habitat. In Wymondham, it is important to note that the Policy promotes ‘expansion of the town centre’. This must be considered as having considerable potential to impact on the existing character of the town, with effects perhaps being on a par with the impact of the development itself. However, the Policy does promote retaining and enhancing the distinctive character of the existing historic centre.</p> <p>In terms of the social effects of this Policy, it is not thought that any of these major growth locations have the specific aim to support regeneration of neighbouring or nearby deprived communities. Similarly, the Policy does not highlight specific existing communities that have the potential to be impacted by these major developments. However, it does make a commitment to “<i>achieve a high level of self containment while integrating well with neighbouring communities</i>”. The Policy highlights the need to deliver healthy, sustainable communities with locally distinctive design and high quality green infrastructure. It is likely that each of the new developments can achieve these ambitions and lead to the development of strong and inclusive communities where residents feel a strong sense of place. In particular, it is important to note that designing in opportunities for walking and cycling, as well as planning for green infrastructure, will have health related benefits.</p> <p>It is also noted that this Policy reaffirms the commitment made through Policy 7 to “<i>provide for a wide range of housing need including giving serious consideration to the provision of sites for gypsies and travellers</i>”.</p> <p>Another issue that is considered for each location is access to services and facilities. For the</p>
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		<p>North East Growth Triangle it is thought that there will be sufficient opportunity to meet needs. It is particularly helpful that the Policy promotes a new secondary school ‘with an initial phase to open as early as possible’, and states that <i>“To facilitate early provision the early phases of development will concentrate on family housing.”</i></p> <p>For the other major growth locations subtly different approaches to ensuring adequate local services and facilities are promoted. For example, a specific commitment is made for Easton/Costessey - <i>“Significant growth at Easton will need to provide an enhanced village centre”</i> – but a an approach that offers less certainty in terms of suitable access (including by walking and cycling) is promoted for Cringleford – <i>“expansion of the existing services nearby”</i>. Provision of education facilities has been a key sustainability consideration throughout the development of this growth strategy. This Policy highlights that some uncertainties remain for Wymondham, Hethersett, Cringleford and Easton/Costessey.</p> <p>Recommendations</p> <ul style="list-style-type: none">• There is a need to develop a bespoke vision for achieving an ambitious degree of self-containment within Long Stratton• This Policy promotes on site or nearby renewable energy generation, for example large scale wind turbines and biomass fuelled Combined Heat Power and Cooling (CHPC). It will be important that this supports the guidance given in Policy 3, taking account of the fact that ambitious schemes may be more difficult to deliver at the smaller growth locations.• Resolve uncertainties surrounding meeting the need for additional secondary school capacity as a result of new development. This should take account of the benefits of allowing children to attend a school that is local to where they live.
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Developing a Vision for Long Stratton

1. Introduction

- 1.1 This paper outlines how a vision for Long Stratton is being developed, highlighting the significance of the local benefits of promoting Long Stratton as an expanded, self contained community. It sets out why it is important to harness growth to meet local objectives and priorities and how this can be achieved.
- 1.2 A version of this paper will form the basis of a wider consultation with residents on “A vision for Long Stratton in 2026”; ideally this will be timed to start during the South Norfolk Site Specific Policies and Allocations DPD consultation in Autumn 2010.
- 1.3 It will also be important to consider what role there is in a vision for Long Stratton for other organisations’ priorities. For example, Norfolk Constabulary’s Safer Neighbourhoods team for Long Stratton has identified priorities relating to Hempnall Crossroads and pedestrian phasing at the A140/Flowerpot Lane junction, which could form part of the overall vision.
- 1.4 This paper does not cover all issues relating to growth of the village. The Greater Norwich Development Partnership (GNDP) Topic Paper on Accommodating Major Housing Growth in the Norwich Policy Area (NPA)¹ identifies the role Long Stratton plays in making the Joint Core Strategy (JCS) robust, deliverable and locally distinctive. The decision-making and sustainability appraisal processes and the potential role of public transport for creating a significant modal shift for journeys to/from Norwich and other settlements are covered in the GNDP’s response to the issues raised by the Inspectors arising from the JCS Exploratory Meeting of 13 May 2010 (i.e. Issue 3: The distribution of development, particularly in relation to public transport opportunities).

2. Recent Consultations

- 2.1 Specific consultation on the role of Long Stratton in the JCS has taken place from the outset, with a question about significant mixed-use growth related to improvements to the A140 in the initial JCS Issues and Options². This was supplemented by a targeted consultation with residents of Long Stratton and surrounding parishes, concerning various levels of growth and their acceptability in relation to provision of a bypass³. Whilst these consultations focussed specifically on the benefits of the bypass, as set out

¹ GNDP Topic Paper: Strategy to Accommodate Major Housing Growth in the Norwich Policy Area (November 2009) (TP 8)

² Question 32, JCS Issues and Options Consultation Report (November 2007) (STA 2)

³ Long Stratton Growth and a Bypass Survey (South Norfolk Council, January 2008)

below, there is also a need to engage the public with developing a comprehensive vision for Long Stratton.

- 2.2 In April 2010 South Norfolk Council engaged The Prince's Foundation to undertake an Enquiry by Design exercise for redevelopment of a site within the existing Development Limit. Although this concentrated on the specific site, its environs and its relationship to local services, facilities and the village centre, work also looked at the wider context of the JCS, transport issues and the future of Long Stratton. Measures to ensure a good level of public engagement included: direct invitations to the parish council and property owners neighbouring the site, plus wider advertising in the parish magazine, a leaflet drop and posters to encourage people to attend. Considerations included the potential for a creating a civic square/hub in the vicinity of South Norfolk House. Further work on developing a vision is noted in 1.2 and 1.3 above.

3. Long Stratton Bypass

- 3.1 A bypass for Long Stratton has been a long-term aspiration of the local community as well as Norfolk County and South Norfolk Councils. Currently the village suffers from environmental damage, air quality issues, noise and community severance, caused by traffic on the A140. This is acknowledged in the JCS Sustainability Appraisal⁴ (pg. 16).
- 3.2 The A140 provides a strategic route between Norwich and Ipswich and the Haven Gateway, also connecting the market town of Diss, Eye Airfield employment area and a host of smaller settlements. The 2005 County Council Committee Report⁵ for the bypass planning application notes that the A140 carries 18,000 vehicles per day, 9% of which are HGVs. The village is a bottleneck on the A140, causing regular time delays at peak periods, with consequent effects on public transport reliability. Sustained growth of the village, both to the east and west, has continued to increase the number of turning movements to and from the A140, adding to the overall levels of congestion in the village. The effect of pollution on air quality and public health remains a significant concern in Long Stratton. Continued monitoring of pollution is being undertaken to check whether or not it exceeds safe levels⁶. The combined effects of poor air quality and safety concerns also have consequences for the number of people choosing to walk and cycle for local journeys.
- 3.3 South Norfolk's Sustainable Community Strategy (SCS)⁷ states that it is 'a high priority to reduce the effects of traffic' in Long Stratton to maintain and

⁴ Greater Norwich Development Partnership Pre-Submission Joint Core Strategy Sustainability Appraisal Report (Scott Wilson, November 2009) **(JCS 3)**

⁵ Norfolk County Council Planning (Regulatory) Committee 18 February 2005

⁶ Connecting Norfolk Evidence Base – Improving Quality of Life and Health (Norfolk County Council 2009)

⁷ Your Sustainable Community Strategy for South Norfolk: Important Issues, Local Action 2008-2018 (South Norfolk Alliance) **(JCS 17.3)**

develop a thriving economy. As PPS12⁸ highlights, the spatial vision developed through the SCS should be reflected in the Core Strategy. PPS12 goes on to emphasise that LDFs should produce a vision that ‘responds to the local challenges’ and has a ‘sense of local distinctiveness’ and ‘community derived objectives’, translated into ‘a set of priorities, programmes, policies, and land allocations’ (PPS12, para. 2.1). Consequently, in responding to local priorities, growth at Long Stratton, linked to the delivery of a bypass, is a key element of the JCS. The need to look at how the JCS will achieve the wider objectives for an area are set out in PPS1⁹ and the Planning Inspectorate’s guidance on examining development plans¹⁰, which states that ‘the starting point for core strategies should be the identification of the critical issues that the council and its delivery partners are seeking to address ... in identifying these critical issues regard should be had to the council’s SCS’; Long Stratton bypass is one of those critical issues.

4. Long Stratton – Role and Potential

- *Existing Self Containment*

- 4.1 Long Stratton has a relatively self-contained housing market, a substantial employment base and a good range of services and facilities.
- 4.2 The settlement forms the centre of one of the ten sub-areas in the Greater Norwich Housing Market Assessment (HMA)¹¹; the sub-areas within the HMA are defined by the majority of the working population living and working in the area and the majority of people moving home without changing job choosing to remain. The degree of self-containment is illustrated by the fact that within the Norwich Policy Area, only Wymondham and Long Stratton are recognised as sub-areas separate to Norwich, despite their good access to the city. Analysis of 2001 census data shows that Long Stratton and Wymondham exhibit a similar, relatively even split between those living and working in the sub-area and those commuting to the Norwich sub-area.
- 4.3 Long Stratton (including Tharston) already has a population in excess of many Norfolk market towns, approximately 5,690 at 2008¹², with over 25% of the 2009 housing stock built within the previous 15 years¹. The village also has a relatively substantial employment base, with approximately 1,700 jobs¹². Overall the ratio of jobs to residents is again comparable to Wymondham, with 1 job per 3.3 residents in Long Stratton and 1 per 2.6 residents in Wymondham and both settlements have a relatively high proportion of the population being of working age¹². However, there is also evidence that the types of job currently available in Long Stratton actually attract commuting *into* the area; despite its central location within South

⁸ Planning Policy Statement 12: Local Spatial Planning (CLG, 2008)

⁹ Planning Policy Statement 1: Delivering Sustainable Development (ODPM/CLG, 2005)

¹⁰ Examining Development Plan Documents: Learning from Experience (PINS, September 2009)

¹¹ Greater Norwich Housing Market Assessment (Greater Norwich Housing Partnership, 2007) (H 2)

¹² Norfolk Market Town Profiles (Norfolk County Council, March 2010)

Norfolk, 2001 Census data indicated that 30% of people employed in the village come from outside of the district¹². Further growth should aim to reduce commuting through:

- Master-planning a variety of local neighbourhoods incorporating a wide choice of properties;
- Greater attractions in terms of a higher quality environment and increased commercial activity to draw employees to live in the village and to reduce the amount of out commuting for shopping, leisure etc.;
- Maintaining a full range of good quality, local services; and
- A range of new employment opportunities.

4.4 Long Stratton already forms an important hub for a surrounding rural hinterland, containing a high school, a leisure centre, a modern health centre, a library, the district council offices, a police station and a range of other services and facilities. These offer the chance for people to link trips and reduce journeys, particularly when seen alongside the day-to-day commercial facilities on offer.

- *Large-scale growth or constrained development*

4.5 Despite being one of the largest settlements in the Norwich Policy Area and having a range of jobs and services, further development at Long Stratton would be severely constrained without a bypass¹³. The options for locating growth elsewhere in the HMA sub-area are also limited, both by the lack of alternative suitable settlements in the JCS hierarchy¹⁴ and because development in surrounding villages also generates traffic accessing jobs, services and facilities in Long Stratton. This means that this sub-area would have very limited scope for additional development to sustain existing employment and services or deliver affordable housing and the effect would be to constrain peoples choice of housing to meet family, employment and social requirements.

- *Enhanced settlement*

4.6 The centre of Long Stratton is a Conservation Area, including a substantial collection of historic buildings, many of which are listed. This area stretches along The Street and is characterised by frontage properties close to the road, forming an important element of the village's character¹⁵. Whereas in most large villages and market towns the central, historic area forms a focus for commercial and community activities, this is severely limited by the volume and nature of traffic on the A140. The impacts of the traffic, including noise and pollution, are felt more acutely because of the linear character of the settlement and the proximity of buildings to the road.

¹³ 20-50 units, as proposed in Policy 7 of the JCS Technical Consultation (GNDP, August 2008) **(STA 4)**

¹⁴ HMA **(H 2)** Long Stratton sub-area includes Service Villages (JCS Policy 15) Aslacton/Great Moulton, Hempnall, Saxlingham Nethergate, and Tasburgh and Other Villages (JCS Policy 16) Forncett St Mary, Forncett St Peter, Hardwick and Topcroft.

¹⁵ Historic Characterisation and Sensitivity Assessment of the GNDP preferred option growth locations (Norfolk County Council, 2009) **(ENV 3)**

Parallel delivery of growth and a bypass opens up opportunities for the centre of Long Stratton to become a much more appealing destination, helping attract local people to use services and facilities in Long Stratton and creating the environment for investment and new commercial opportunities. In particular the opportunities for leisure activities, such as cafes, bars and restaurants, could be enhanced, giving Long Stratton a stronger evening economy. An enhanced centre would be the catalyst for a revitalized Long Stratton.

- 4.7 Other important considerations for delivering a well-rounded, self-contained settlement are:
- Improved services necessitated by a growing population that will in themselves generate jobs, as will increases in commercial facilities;
 - The concentration of facilities within a relatively small geographic area, which increases the potential for walking and cycling (possibly to a greater extent than other growth locations), which should be greatly enhanced by the removal of through traffic and the careful master-planning and design of new development; and
 - Consideration of the Historic Characterisation and Sensitivity Assessment¹⁵ in terms of integrating the growing settlement with the grain of the surrounding countryside and opening up green infrastructure/recreation opportunities within close proximity of residents.
- 4.8 An assessment is attached (Table 1) of the current strengths and weaknesses of Long Stratton in terms of delivering a settlement that maximises the potential for non-car transport and has an ambitious degree of self-containment. By 2026 the level of growth (housing, commercial and employment), provision of the bypass and the consequent environmental improvements, and the necessary master planning of the development will aim to redress the current shortcomings and rejuvenate Long Stratton.

5. Delivery

- 5.1 Whilst a bypass is a prerequisite for anything more than very limited growth in Long Stratton, and a high profile reason for focussing development in the village, new housing of the scale proposed will also require a range of other essential infrastructure, including an appropriate proportion to be affordable housing. The delivery process is outlined in the GNDP's Local Investment Plan and Programme (LIPP)¹⁶ (previously known as the Integrated Development Programme or IDP), which looks at co-ordinating funding across a range of service providers. Currently the LIPP shows that the most critical need for investment is in the infrastructure for water supply, wastewater treatment and electricity supply. The LIPP will continue to evolve as the investment plans of service providers and funding bodies etc. are established and refreshed. In parallel, the Long Stratton bypass will also be a key feature of the GNDP's Local Investment Plan and Programme discussions with the Homes and Communities Agency.

¹⁶ GNDP Draft Local Investment Plan and Programme (Version 1 – September 2010)

Table 1: Strengths and Weaknesses Assessment of Long Stratton

Already Present (likely to need some improvement to meet additional population):
Population – In terms of Main Towns in the JCS Long Stratton is currently similar in size to Aylsham and larger than Harleston ⁸ 1,800 additional dwellings would create a settlement of a similar size to Diss/Roydon.
Employment – broad range of commercial (around The Street), public sector (SNC, Saffron Housing, Health Centre, Leisure Centre, Schools, Library, Police Station etc.) and small-scale business/industry (Tharston Industrial Estate) employers. Currently more jobs than Harleston, but less than 1/3 of numbers in Diss or Wymondham, plus a relatively high level of commuting, in and out ⁸ . Could new provision look at potential niches to help focus provision?
Primary Health Care - modern Health Centre plus Dentist
Education - Primary and Secondary to Year 11, with scope for onsite expansion.
Civic Buildings – Inc District Council, Library, Police and Fire Stations and the potential to create a civic hub for South Norfolk.
Recreation – good range of indoor and outdoor provision including Leisure Centre and Multi Use Games Area.
Places of Worship
Partially Present (capable of significant improvement as a result of growth):
Good public transport to higher-level settlements - principally to Norwich and Diss, but also some to Harleston and Wymondham.
Serves a rural hinterland - but currently limited by the greater draw of Norwich, Wymondham & Diss.
Retail: food/convenience goods - good range of independent providers e.g. bakers, butchers etc. likely to be a need for additional supermarket provision to regain/retain shopping lost to Tesco at Harford Bridge, Tesco/Morrisons at Diss and Waitrose at Wymondham.
Retail: comparison goods - some limited provision for clothes, gifts, books etc., but not furniture/white goods, scope limited by the proximity of Norwich.
Evening Economy/Activity - limited to two pubs and various take-aways; current lack of cafes, bars and restaurants for both the daytime and evening economy, plus a perceived need for more activities for young people e.g. 'youth café'.
Definable centre e.g. town square/market place - currently has fewer town centre business premises than other GNDP main towns ¹ Almost two centres at present, 'commercial' along The Street and 'community' along Swan Lane, quality of the environment in The Street limits people's use of the centre, potential for a 'square' at The Plain.

Civic identity/Historic core - concentration of historic/Listed Buildings in the Conservation Area, however potential to create identity overwhelmed by traffic/poor environmental conditions through the centre of the village.
Community buildings - very limited village hall, not even used for Parish Council meetings.
Swimming Pool – pool at the High School, but limited public access.
Self-containment – deficiencies listed limit the overall self-containment of the village.
Not Present (possibly with potential for improvement as a result of growth)
Good public transport to the rural hinterland
Public Transport Hub – place of interchange for busses, taxis, cyclists, pedestrians etc.
Post-16 and tertiary education
Cultural Activities – e.g. festival, gallery/exhibition space, performance space.
Mayor – civic champion/enhancing civic identity
Vitality and Sense of Place – including civic society, heritage group etc.