

## Greater Norwich Development Partnership

### **Matter 3b Old Catton/ Sprowston/ Rackheath/ Thorpe St Andrew growth triangle (part policy 10 and appendix 5)**

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

#### **Procedure**

B1 In principle (aside from any comments about its content), do policy 10 and appendix 5 (as amended by GNDP Focussed Changes 8-10, including the concept statement) provide a sound procedural basis for the strategic allocation of the growth triangle and an appropriate level of guidance for taking its development forward in a coordinated way without an AAP through future detailed master planning of the various 'quarters'?

1. The principle of major development in this location is addressed under matter 3 part B2.
2. The proposal for a strategic allocation in the Focussed Changes published for representations was primarily driven by the need to establish a planning framework as quickly as possible, in view of pressures to maintain a five year supply of housing land. A degree of consensus around the Concept Statement included in the focused changes would have given confidence that the SPD route could deliver a framework with a wide degree of "buy in" as quickly as possible. However, having considered the response to the Focused Changes the GNDP authorities took the view that there was unlikely to be the degree of consensus required, and that in light of the probable need for resolution of differing aspirations/ positions, the more formalised route of the Area Action Plan (or another formal part of the process if the Government should revise the plan making system) would be more appropriate.
3. In light of this conclusion, and the decision to revert to the JCS as originally submitted in this regard, with detailed planning to be undertaken through the formal development plan document route, the soundness of the SPD route does not arise.

## Soundness of the proposal

B2 Is this strategic allocation justified, effective and consistent with national policy?

1. Although this is no longer a strategic allocation, it is still necessary to consider the logic of major development in the form of a concentrated urban extension in this location. The selection of the north east as a location for major growth, the concentration approach and the scale of growth proposed is set out in topic paper TP 8.

Justified

2. The extensive evidence base covers a spectrum of factors including environment, transport and service provision (including utilities as well as social infrastructure). Page 4 of TP 8 summarises the factors shaping the spatial strategy. Document EIP 70 demonstrates the need for overall JCS housing targets, and therefore the analysis in TP8 is still valid. Section 7.1 of TP8 discusses the historic pattern of growth around Norwich, and 7.4 summarises the results of early consultation on appropriate criteria for locating new housing development.

3. Appendix 2 of TP 8 explains thinking behind the selection of the north east as a major urban extension. It highlights the conclusions of the sustainability appraisal of alternative locations within the Broadland part of the NPA and examines the merits of concentration for social infrastructure delivery.

4. Appendix 2 includes public response at the issues and options stage to different locations, and to the initial stages of preparation of an earlier Broadland core strategy (before commencing the joint process) looking at alternative strategies to accommodate development within the Broadland part of the Norwich policy area.

5. This is summarised in the conclusion in section 4 of appendix 2 of TP8.

6. The NDR is promoted as a major scheme in Norfolk County Council's 2nd Local Transport Plan (2006-2011). The JCS, must have regard to other plans and strategies and has recognised this commitment in developing a strategy that maximises the opportunities offered by the scheme.

Effective

7. TP8 includes an assessment of the potential rates at which large scale developments can realistically be delivered. The LIPP (EIP 85)

indicates the analysis of infrastructure requirements, and the capacity to provide infrastructure.

8. There are no regulatory barriers in principle to the delivery of the triangle. There are requirements to be satisfied however, principally relating to the Habitats Regulations. The issue particular to this area is the risk of increased visitor pressure on sensitive environments, particularly around the Broads, and the JCS requires this to be alleviated through the provision of appropriate and attractive green infrastructure.
9. The concept of independent, but linked, quarters referred to in Policy 10 adds to flexibility. Inevitably there is some critical infrastructure required to be co-ordinated across the growth triangle as a whole. This includes utilities, green infrastructure, the location of a district centre, a secondary school and transport infrastructure. The County Council is responsible for the latter two.
10. Flexibility around the delivery of the high school can be offered through the use of existing high schools ahead of local provision. The LIPP (EIP 85) assumes delivery of phase 1 by 2021.
11. Transport interventions can be introduced in a phased manner, for example bus rapid transit can evolve in stages from the present level of service through incremental improvements, and cycle/pedestrian routes can be provided in stages as development progresses, provided there is an overall concept towards which all parties are working.
12. Water supply issues are not particular to the growth triangle but are related to the ability to accommodate planned levels of growth irrespective of precise location. In terms of waste water disposal, the Water Cycle Study (ENV 4.1-ENV 4.5) indicates that there is capacity for some 4000 dwellings in the existing pumping main linking the western part of the growth triangle to Whitlingham sewage treatment works which itself has no capacity limitations which would prevent the planned levels of growth.
13. Green infrastructure will be provided in parallel with development, in accord with the overall guiding framework.

#### National Policy

14. The growth triangle fully accords with national planning policy statements and guidance. The Government Office has been involved throughout and has raised no concerns.

- B3 Does the amended concept statement provide sound guidance for the development? Are the content and objectives of the two maps in the concept statement effectively communicated, or does the key need to include further explanation of the 'areas of green space' and the 'constraints and opportunities for new development'?

1. Following the publication of the focused changes, the GNDP authorities decided not to proceed with the proposed strategic allocation and concept statement, and the question is no longer applicable.

### **Transport issues related to the growth triangle**

- B4 Is the Northern Distributor Road (NDR) justified and effective as the means of providing the 'necessary access to key strategic employment and growth locations' and releasing road capacity to achieve 'significant improvement to public transport, walking and cycling in Norwich', and particularly North Norwich (JCS para 5.44)?

1. The NDR is included in Norfolk County Council's 2<sup>nd</sup> Local Transport Plan (2006-2011), is fully justified through its Major Scheme Business Case and achieved Programme Entry status.
2. The NDR provides direct linkage to the strategic employment locations at the airport, Rackheath and Broadland Business Park. The Postwick Hub proposals include an enhancement to the existing trunk road junction that currently serves Broadland Business Park. Without this the remainder of the existing allocation at Broadland Business Park cannot be developed, or the proposed expansion in the JCS brought forward. The Postwick Hub releases land at Broadland Business Park and unlocks about 1600 houses (see also the response to matter B8.) The NDR builds on the Postwick Hub improvements and provides a strategic road link to the airport and surrounding employment areas from the national trunk road network.
3. The NDR in itself is not the primary means of providing access to the Growth Triangle. The Growth Triangle will build on the existing transport linkages to the city centre and local services and employment areas. However, there are existing problems of congestion, delay and vehicles using unsuitable routes that will be resolved by the NDR (see Figure 1 of EIP 88).
4. The scale of growth in the North east will require local improvements to public transport. Appendix D of EIP 88 shows the enhancements to support growth in the North East. To deliver these bus priority and reliability measures need to be introduced. These rely on the capacity released by the NDR.

5. These issues are discussed in more detail in the response to Matter 5.

B5 The NATS implementation diagram at p61 provides a proposed pattern of public transport interchanges, bus rapid transit corridors, core bus routes, park and ride sites, and key cycle corridors. In relation to the growth triangle: (1) What degree of public transport use/modal shift is aimed for? (2) What is the programme for completing the constituent elements of NATS? (3) Is there reasonable prospect of these being implemented within a timescale in step with new development, or would the NDR tend, instead, to generate more car dependency? (4) Is the relative remoteness of the ecotown from current transport infrastructure likely to militate against high public transport useage? (5) Would an effective JCS set minimum threshold levels of public transport accessibility, allied to the progress of development?

1. The interventions necessary to set monitor and manage transport indicators are at a level of detail not appropriate to the JCS. While the JCS does not itself set targets for modal shift, it is predicated on public transport based development. EIP 88 shows that the scale and distribution of the major growth locations, including the Growth Triangle, can support viable and deliverable high quality public transport. The JCS as a high level strategy has identified locations that provide the opportunity and potential to be served by public transport but the delivery mechanism will be through the NATS Implementation Plan (EIP9 and 10). Norfolk County Council is responsible for NATS and is a partner in the preparation of the JCS. The NATS Implementation Plan has been developed alongside the JCS. The Implementation Plan and monitoring plan is being further developed alongside LTP3. LTP3 / NATS will determine appropriate targets to monitor and manage implementation to achieve JCS objectives.
2. The NATS Implementation Plan is the programme. NATS has a strong track record of delivering public transport interventions. Section 4 of EIP 88 sets out what has been delivered recently. A number of the schemes have already directly contributed to enhancing the proposed BRT routes such as the extension of the bus lane on A11 Newmarket Road and improved passenger information on Dereham Road. Looking forward, further work is programmed on Dereham Road and through the Rackheath Low Carbon Community Programme of Delivery the initial phases of sustainable transport links to the Growth Triangle. Appendix D of EIP 88 identifies how transport interventions relate to the scale and phasing of growth and the promotion of public transport. The public transport service improvements can be supported by development contributions in the early years before becoming commercially viable. This is demonstrated by experience of other large sites across Norwich. As indicated in response to 1 above there are no

rigid timescales as implementation will depend on the rate of growth and responses from the public transport operators. Funding for interventions will come from a variety of sources, including mainstream public funding and developer contributions. At this time there are not detailed funding plans, but the existing mechanisms for promoting schemes would be used to deliver elements of the strategy as appropriate. Given that public transport interventions can be phased, schemes can be developed and tailored to meet the needs as funding becomes available.

3. Public transport interventions will be delivered in step with development. EIP 88 demonstrates how this will be achieved. There are good recent examples of bus operators serving new large development sites in Norwich commercially from the outset without developer contributions. An example is Queens Hills, Costessey where two bus operators have served the site from first occupation, taking advantage of the established public transport corridor. The NDR does not provide a direct route for local and city centre trips that would arise from the Growth Triangle and is not providing capacity for car trips to compete against the planned public transport enhancements. Provision of the NDR gives the scope for specific interventions to assist public transport delivery. Without these interventions public transport service enhancements will be diluted by the impacts of local congestion that will make services less reliable and slower. This has a twofold effect.
  - i. Public perception and uptake of the bus services declines and;
  - ii. It becomes more costly for operators to continue to deliver the required level of service as slower more unreliable journey times will require the introduction of further vehicles which in turn reduces commercial viability.
4. The effectiveness of public transport and the NDR will need to be reinforced through appropriate planning layout and design of the new communities, as required by Policy 2, but the detail is outside the scope of the JCS.
5. The Rackheath development is only one element of the Growth Triangle and will not be a stand alone element in the overall strategy. The trajectories merely assume an early start because of government support. The Growth Triangle will be served by a BRT corridor which will continue to be enhanced alongside development. Early design work is underway. Public transport, walking and cycling interventions to support the earlier timescale for Rackheath are set out in the draft LIPP (EIP85), and form the start of a longer term investment in public transport interventions to support the Growth Triangle in its entirety.
6. EIP 88 sets out public transport thresholds allied to major growth locations generally in Table 2 and specifically for the Growth

Triangle in Appendix D. The Growth Triangle is served by existing public transport as set out in 5.5.2 of EIP 88, which will be further enhanced as part of these proposals. Options exist for travel by bus and train and linkages to cycle networks will be improved to achieve modal shift. Policy 2 of the JCS requires that future planning and layout of specific development proposals take advantage of the opportunities to develop high quality public transport, walking and cycling networks from the outset. Norfolk County Council will work with those producing more detailed planning documents to make sure the key features to support walking, cycling and public transport are embedded in designs.

- B6 In view of the importance seemingly ascribed to the proposed eco-town's proximity to rail services at the time of its selection as such, is there any demonstrably realistic prospect of significant improvement to the low level of service and the limited number of destinations currently available on the Norwich-Cromer line, or its transformation into some other form of more attractive public transport facility?

1. The concept of tram train derives from the promoters of the low carbon development at Rackheath, but it is dependent on overcoming operational barriers to the use of light rail rolling stock on heavy rail infrastructure. At this time public transport enhancements are focussed on BRT as this will better serve the NE as a whole. The Rackheath site does have the opportunity for rail and the part rail plays in future public transport delivery will be kept under review through NATS.

### **Implementation issues associated with the triangle**

- B7 If the NDR is fundamental to the delivery of the JCS [para 5.44], are the resources likely to be in place to achieve it, and when? [The answer to this question may or may not become clearer after the October budget after which, if it is budgeted, an inquiry into the Postwick Hub will be required.] What would be the consequences of a possibly unknown length of delay in provision of the NDR? Does the JCS have flexibility in this respect, bearing in mind that JCS policy 10 states that 'Delivery (of the growth triangle) is dependent on the implementation of the Northern Distributor Road (NDR)'.

1. The Council Council's Cabinet approved the NATS Implementation Plan at its 6 April 2010 meeting (EIP 9 and EIP 10). The NDR and Postwick Hub position was updated within this paper and the Cabinet confirmed its commitment to the NDR as a priority of the County Council. In particular it agreed to underwrite the increased funding shortfall (from £27.5m to £39.7m), brought about by Department for Transport's decision not to fund the NDR beyond the

A140 junction, and agreed to continue with the NDR planning application to the A1067, as originally planned.

2. This highlights the County Council's continuing determination to ensure the delivery of the NDR, as it recognises the central importance of this key infrastructure in order to be able to continue the successes so far achieved through NATS, and to enable the continuing roll out of the initiatives set out in the approved Implementation Plan
3. The County Council, along with its GNDP partners are continuing to work on projects that form part of the NATS Implementation Plan, such as the major St Augustine's gyratory improvement, A11 corridor bus lane improvements, BRT development on Dereham Road and towards the Eco-Community as part of its Programme of Development.
4. Given this level of commitment to improve transportation in Norwich, it is clear that whilst some delay to the NDR would not be desirable, it would not diminish the determination to see it delivered as part of the wider NATS Implementation Plan. Even if Government funding for the NDR is delayed, every possible funding opportunity, such as CIL, TIF and the scope for local tariffs, County Council contributions and developer contributions will be explored to ensure that the critical infrastructure required for the JCS (which includes the NDR) is delivered. The Infrastructure Study and the work associated with the LIPP confirm both the priority given to the NDR but also the scope for alternative funding mechanisms to contribute towards its provision.
5. There will be a Public Inquiry (PI) into the Side Road Orders (SROs) for Postwick Hub. However, the PI will not be instructed until the spending review announcement has been made. There are no statutory objections to the SROs, however there are a number of non-statutory objections and it is this that has prompted the decision regarding the PI. The County Council is confident that it will successfully defend any SRO objections at the PI. The planning position for the junction is very strong; it has planning consent, and this includes an associated business park development. In addition, current proposals within the growth triangle for an extension to the existing Broadland Business Park and housing development (Brook Farm) are reliant on the Postwick Hub being implemented.
6. There is scope for the first 1600 homes to be delivered after the provision of the Postwick Hub. Any delay in the provision of the NDR would result in delay in the delivery of further growth in the Growth Triangle.

B8 Paragraphs 44-48 of the Concept Statement at Appendix 5 (Focussed Change FC10) confirm that there can be no commitment to large-scale development in the growth triangle but assess that some 2200 dwellings (which appear to represent existing permissions and allocations [?] – see para 47) may be acceptably developed subject to ‘interim improvements for other modes’ and ‘knowledge that the Postwick Hub improvement will be delivered and the NDR is committed’. In addition, it is suggested that a further 1000 dwellings may be built at the Eco-town, [By reference to the annualised build figures for the various growth locations this means that the eco-town could progress to the stage expected by mid 2014-15 and the rest of the growth area to the stage expected by as late as mid 2021/22.] Question - Are these ‘sound’ limits/expectations, or should growth be more or less constrained in the absence of firm commitment to/funding of a start to the NDR?

1. Section 7 of EIP 88 demonstrates the relationship between the NDR, other transport infrastructure and growth. Importantly EIP 88 shows that without the Postwick Hub only the exemplar phase of the Rackheath proposals (200 homes) and current local plan commitments can go forward. Improvements to the trunk road junction achieved through the Postwick Hub proposals will release Phase 2 of the existing allocation at Broadland Business Park, and the potential for 1600 additional homes in the Growth Triangle. If the Postwick improvement is not provided there is likely to be an objection from the Highways Agency which could prevent any further development until the trunk road issues are resolved. This is the first constraint on development.
2. The 2200 represents existing and potential new commitments. A site currently allocated for housing in the adopted local plan, and with a resolution to grant planning permission, could account for about 1200 dwellings. The neighbouring site currently under construction could yield a further 200 or so dwellings. These can clearly proceed without Postwick Hub/NDR. Taking these into account, the thresholds envisaged, which could be built without any intervention are:
  - Existing commitments - 1400
  - Rackheath exemplar - 200
3. An additional 1600 dwellings are dependent on the new link road and Postwick hub. In the concept statement these were envisaged to be:
  - Early phases at Rackheath – 1000
  - Additional new commitment within link road – 600
4. (These figures correspond to the indicative thresholds of 2200 plus 1000 referred to in paragraphs 45 and 46 of the concept statement, and also to the 1600 released by the Postwick hub and new link road referred to in the response to question B4)

5. The indicative trajectory in Appendix 6 of the JCS suggests that the scale of growth at Rackheath and in the remainder of the triangle that can take place without the NDR, could progress into 2016/17, beyond the target opening date of the NDR of 2015/16. If the NDR can be delivered on time, there should be no interruption to delivery.
6. The trajectories assume an early start for Rackheath because of government support and developer activity, but this is not a phasing requirement of the JCS.

B9 What are the other critical infrastructure dependencies of the eco-town and the other component parts of the triangle? Are these parts divisible/indivisible in terms of these dependencies?

1. Critical infrastructure for the north east triangle is covered in the LIPP (EIP85) and revised Appendix 7 of the JCS (EIP84) (see also matter 4A).
2. The growth triangle, including Rackheath, is an integrated whole and should not be separated.
3. Apart from transport (dealt with at B8) the principal indivisible elements are overall water supply, which is critical to the strategy as a whole, trunk sewer capacity following the use of existing spare capacity, and major electricity investment. These elements are critical in terms of showstoppers. In this instance, green infrastructure is also critical in order to avoid conflict with the Habitats Regulations though phasing of its provision may be possible. In addition, the high school is indivisible in the sense that it needs a critical mass to support it in the long term, though its provision may be phased.

### Other issue

B10 If the JCS is unsound in relation to the growth triangle, are there any specific changes that would render it sound? [It would be necessary to consider whether these required further consultation or sustainability appraisal.]

1. The evidence demonstrates that the growth triangle is sound, proposed minor changes (JCS2 and EIP93) address drafting errors and provide clarity. If the inspectors consider the spatial strategy is fundamentally flawed in proposing a major urban extension in the north east, it is hard to see how the current strategy could be made sound without very major revision.

