

**Examination into the Joint Core Strategy (JCS) For Broadland, Norwich
and South Norfolk Produced by
The Greater Norwich Development Partnership**

Response to Inspector's Questions and Matters

Matter 3

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

**Submissions by Savills (L&P) Ltd
on behalf of Taylor Wimpey UK Ltd, Hopkins Homes Ltd, Persimmon
Homes (Anglia) (respondent no. 8726), part of the Broadland Land Trust
(respondent no. 8366)**

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

Part A - Overall distribution of growth

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

1. Norwich is one of the major urban areas in the East of England. It has a population of around 210,400.¹ Around 100,000 people work with the area covered by Norwich City Council, 50,000 of whom travel into the City from other districts.² Norwich is ranked 8th in the 2009 Venuescore UK shopping rankings and 13th in Experian 2008 ranking. It is the prime shopping destination in the East of England. Norwich has a mainline railway station with direct rail services to London and Cambridge and a number of towns within Norfolk.
2. In relation to National policy, therefore, Norwich is the main centre within the plan area and to which significant development ought to be directed. It has good economic prospects and a wide range of supporting infrastructure. These sustainability benefits led to the identification of Norwich as a Key Centre for Development and Change in the RS. Prior to the publication of the RS, RPG6 provided the strategic framework for planning and policies 4 and 6 identified that Norwich [along with King's Lynn in Norfolk] should be the priority focus for housing and employment.
3. Prior to RPG6 the Norfolk Structure Plan 1999 sought to locate major new housing, employment and commercial development at Norwich, Great Yarmouth, King's Lynn, Thetford and Dereham.
4. Norwich has long been recognised as a highly sustainable location for development, not only in the County, but also in the East of England. It is right therefore that the JCS seeks to meet its major housing and employment needs in and close to Norwich as a priority.
5. In terms of locations for growth around Norwich, growth in the North East sector of Norwich provides the opportunity to deliver a major new community. The quantum of growth located in the North East sector has been derived by considering environmental constraints and identifying the components of a sustainable community. It is clear from the Land Budget (EIP94) that over time 10,000 homes along with supporting facilities can be comfortably delivered in the North East sector.

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

Infrastructure

6. Development at North East Norwich is deliverable in both infrastructure and market terms. A significant amount of work has been undertaken on infrastructure needed to support the planned growth.
7. In terms of wastewater, para. 1.3 of the Water Cycle Study (WCS) 2b states that Whitlingham Wastewater Treatment Works (WWTW) has high volumetric capacity available for 51,860 further dwellings, but there is a need for mains improvements to the

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http://www.norfolk.gov.uk/consumption/groups/public/documents/general_resources/ncc041451.pdf

² http://www.norwich.gov.uk/site_files/pages/City_Council_Key_Statistics.html#economy

wastewater network and technological improvements (to reduce phosphorus emissions) to protect The Broads SAC. Para. 7.4.4 of Stage 2b of the WCS states that there is sufficient capacity within the strategic sewer network to accommodate 4,000 homes for transfer to Whitlingham. The WCS identifies a need to provide further interceptor capacity through AMP7. Whilst this may not be delivered before 2020 under AMP7, there is capacity to enable development to proceed ahead of this interceptor sewer. Wastewater capacity does not appear to represent an insurmountable problem in relation to North East Norwich.

8. In terms of water supply, the constraints that exist apply to the whole plan area, rather than to the North East sector. Paragraph 7.4.8 of the WCS 2b identifies that existing mains should be sufficient to supply development in North East Norwich, although local pumping stations may be required in parts of the area. The Stage 2b report includes a number of position statements including from Anglian Water and the Environment Agency (ENV 4.5). Anglian Water's letter of 28 January 2010 confirms its view that sufficient supplies can be made available to meet planned growth. The Environment Agency's position statement of 27 January 2010 confirms its view that the review of consents and water resources is not a risk to development in Greater Norwich.
9. We set out under Matter B our views on the transport infrastructure in relation to North East Norwich. Growth in this area will facilitate the delivery of transport infrastructure, including an inner link from Postwick to Sprowston and improvements to public transport. The measures required to enable development at the urban edge are deliverable and not a constraint to development.

Markets

10. North East Norwich falls within the Norwich Housing Market Area. The Housing Market Assessment (H2) identifies separate housing markets at Wymondham and Long Stratton. The HMA also identifies serious issues in terms of the location of jobs and in relation to where people live in the Wymondham and Long Stratton HMAs and in terms of the mix of communities.
11. The HMA identifies that:
 - in the Long Stratton housing market area, 39% of the working population works in the Norwich housing market area ;
 - in Wymondham, 36% work in the Norwich housing market area;
 - in the Norwich housing market, 85% of the working population live and work within the market area.
12. Locating new homes in and close to Norwich provides a better balance between employment and the location of labour force.
13. The HMA also identifies a scarcity of larger and family accommodation at Norwich. Additional family accommodation in and close to Norwich is in strong demand and important to provide community vitality. Locations such as North East Norwich offer the opportunity to provide a better balance between type of housing provision at Norwich.
14. A number of pieces of research on delivery rates underpin the JCS. In an average market, national house builders work on the basis of one market sale per week, so a single developer on site might build and sell 50 units a year. Rates clearly rise and fall with market conditions. In order to drive delivery it is likely that a number of house builders will operate on major sites at any one time. Appendix 6 of the JCS is based on up to 350 homes a year being delivered within the growth triangle, suggesting up to 4 or 5 house builders operating across the growth triangle. Given the scale of the area and variety of locations we consider that this is not unduly onerous in market terms.

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

15. We consider that the JCS means that in order for planning permission to be granted any application must adequately address the relevant infrastructure required for the development in question. Such infrastructure may be delivered via a variety of mechanisms. However, the wording is rather pejorative and unnecessary. What is important and relevant is that there is reasonable prospect that the necessary infrastructure can be delivered at the point at which it is required.

16. We consider that the DPD does provide sufficient clarity regarding such issues given that it is a strategic document and that additional information will come forward as further detailed work is undertaken in relation to individual sites.

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

17. We consider that the second sentence is unnecessary and can simply be deleted. In relation to design, the bullets within Policy 10 cover what is required. In relation to rectifying deficiencies, at the heart of the question is the point that any contributions must be related to development in question. Redressing existing deficiencies falls foul of the CIL regulations and the suggestions is therefore inappropriate and can not make such contributions lawful. Given that legislation changes over time, it is unhelpful to make specific reference to such regulations in the plan. Any contributions sought and provided must comply with the legislative background at the time.

Part B Old Catton/Sproston/Rackheath/Thorpe St Andrew growth triangle (part policy 10 and appendix 5)

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'?

18. Taylor Wimpey UK Ltd, Hopkins Homes Ltd and Persimmon Homes (Anglia) control land at White House Farm, Sproston within the growth triangle. The site adjoins committed development and comprises just under 80 hectares. Our clients are currently working, with a number of other landowners in the area between Sproston and Postwick under the banner of the Broadland Land Trust (BLT). Representations were submitted by a number of interests collectively under this banner to the JCS. Discussions between these interests continue, although as yet no formal delivery mechanism has been constituted.
19. We consider that the growth triangle represents a sustainable location for growth and that in identifying this as a direction of growth the JCS is sound. A key issue is ensuring that the planning system enables the delivery of development within the growth triangle.
20. Our clients support the need to work collaboratively with other landowners, the Councils and other stakeholders within the area. We have previously expressed concerns regarding the meaning of "a single co-ordinated approach" in Policy 10. We understand that the authorities mean this to cover the need for an overarching planning strategy to co-ordinate delivery and infrastructure, but that this does not mean a single planning application is required for the whole growth triangle. We consider that the terminology does not add clarity and would be better omitted from the JCS. The authorities have abandoned the strategic allocation and intend to prepare an Area Action Plan (AAP). There is a danger of an elongated planning policy approach. We consider therefore that production of an AAP needs to follow swiftly behind the JCS and that the authorities should seek to parallel as many processes as possible. Despite the planning reforms commenced in 2004 which sought to speed the development plan process, the effect has been if anything to delay further the bringing forward of up to date plans. We consider therefore that the councils should seek to streamline development plan processes as far as possible, whilst maintaining effective engagement. For example, it appears to have become the norm to consult on issues and options, then to consult on preferred options, before consulting on the publication version of a DPD. That is often then followed by consultation on further changes. Changes introduced in the regulations 2008 sought to further streamline the system by in effect removing the preferred options stage. We consider that this type of approach could reduce the time taken to produce an AAP from 3 years to 2. We also consider that the authorities should seek to twin-track planning applications with the development plan process, enabling decisions to be reached on major schemes at or around the time DPDs are adopted. Such an approach will facilitate delivery.

Soundness of the proposal

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

21. Growth in the North East sector of Norwich provides the opportunity to deliver a major new community. The quantum of growth located in the North East sector has been derived by considering environmental and infrastructure constraints and identifying the

components of a sustainable community. The location can be served by high quality public transport into Norwich city centre via the Salhouse Road corridor as part of the bus rapid transit (BRT) and the Wroxham Road corridor as part of the core network. Parts of the Growth Triangle, close to the urban edge are already well-located in relation to existing public transport as identified at paragraph 3.5 of the NATS Implementation Plan.

22. PPS3 and PPG13 seeks to reduce carbon emissions by focussing new housing at existing main urban areas and in locations with good public transport accessibility and/or by means other than the private car (PPS3 para 37 and PPS13 para. 6). In response to Matter 3A1 we set out that Norwich and locations close to it represent and remain the most sustainable locations for accommodating growth.
23. It is clear from the Land Budget (EIP94) that over time 10,000 homes along with supporting facilities can be comfortably delivered in the North East sector.
24. The JCS seeks to deliver a significant quantum of development across the plan area. It also proposes a number of strategic growth locations. It is inevitable that in delivering the strategy and development at each of the growth locations there will be a number of issues to resolve. However, the JCS is supported by a range of evidence. As developments progress and even more detailed work is undertaken, the detailed solutions to current issues will evolve and become more certain. Given the strategic nature of the JCS, identifying the North East sector as a strategic growth location is justified, effective and consistent with national policy.

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'?

25. We submitted a number of comments on the concept statement as part of the Focussed Changes. Given the decision not to submit the Focussed Changes in relation to the growth triangle, we consider that the concept statement need not be examined. We trust that GNDP will take those comments submitted and make use of those in preparing the AAP, which is the appropriate vehicle for considering the issues identified above.

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)?

26. The NDR is proposed by the Councils as a strategic scheme, required to facilitate delivery of the overall strategy. We are of the view that land close to the urban edge can be delivered in advance of the NDR.
27. Our clients already have planning permission for 1,233 homes on land at Sprowston. That proposal will deliver the first element of the inner link road, running from Wroxham Road to Salhouse Road. We consider that it would actually be beneficial to deliver growth inside the NDR in advance of its construction. It is essential with new development that sustainable transport alternatives are provided in advance of improved highway capacity to ensure such options are available at the outset to occupiers of new homes. Whilst a stated purpose of the NDR is intended to free up road space for public transport measures, we consider that public transport improvements can be provided alongside early phases of development. This can be achieved by enhancing existing

services. We are also of the view that ahead of the NDR there is potential for further measures, such as bus priority, to be delivered within the existing highway.

28. Analysis of Census 2001 data (see Table 1) suggests that around 85% of trips in the area are likely to be localised, with the majority of trips being made within Sprowston or the city centre. The urban edge at Sprowston is a highly sustainable location. Achieving a substantial proportion of journeys by non-car modes from development located on the urban edge is likely to be realistic and achievable.

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 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?

29. Parts of the urban edge within the growth triangle already have high levels of public transport accessibility as set out at para. 3.5 of the NATS implementation plan. As we have already set out, North East Norwich represents a highly sustainable location for development, with good public transport accessibility, good connections to the city centre and employment areas and where travel by non-car modes is likely to be realistic and achievable. It is unclear therefore, why North East Norwich should be singled out in the matters for questions regarding modal shift. Given the growth triangle's excellent existing public transport links, we consider that it is other locations less well located and away from Norwich where fundamental questions about the achievability of modal share should be directed.
30. We consider that there are advantages in delivering development at the urban edge ahead of the NDR. There is much evidence to suggest that travel habits are formed early. Delivering development ahead of the NDR combined with improvements to public transport from development along with design measures as part of integrated communities will help establish travel patterns from the outset and reduce car dependency.

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)'?

31. The NDR has been granted Programme Entry Status to the Targeted Programme of Improvements (TPI). In advance of the NDR being implemented, improvements to public transport, designed to facilitate walking and cycling, along with delivering the inner link road between Sprowston and Postwick will enable development adjoining the urban edge in a highly sustainable location. The quantum of development that can be achieved will depend upon further detailed testing and the transport options brought forward to support modal shift. Detailed transport assessments will be required to determine the precise

levels of development that can be accommodated, but with a well-balanced package of measures, combined with a design philosophy based on walkable neighbourhoods, substantial development close to the urban edge can be delivered in advance of the NDR.

32. We understand that during October Departments will receive indicative budgets, but it will not be until the end of the year that it will become clear what the spending priorities are. Notwithstanding that, the certainty regarding the NDR is no different to any other scheme within the TPI. Entry into the TPI indicates a commitment from Government to the scheme, but funding for such schemes can only be confirmed once all statutory procedures have been followed.
33. If it is determined that the NDR is required and that development is required to assist in funding, it will be important that the strategic nature of the scheme and its wider benefits are recognised in seeking contributions.
34. We consider that there is flexibility for development to come forward in stages. It is not the role of the JCS to determine which might be delivered in advance of the NDR being completed. Rather that is a task for the AAP.
35. Whilst we support the delivery of an inner link road from Sprowston to Postwick, we also consider that development at the urban edge can proceed in advance of completion of the entire link and the Postwick Hub. As we have already set out, analysis of the Census 2001 data shows that journeys from the Sprowston area tend to be localised and towards the city centre. There is unlikely to be significant travel toward Postwick.
36. In terms of limiting growth on transport grounds, the SHLAA stage 8 report, at para. 2.14, states that it is "a cautious assumption based upon a particular viewpoint about the satisfactory functioning of the highway network..." and goes on to say that "It is quite possible that in real terms greater levels of development may be appropriate if a firm commitment is in place to deliver longer term transport solutions."
37. Further detailed analysis, coupled with transport strategies which focus on maximising non-car modes, are likely to ensure that development close to the urban edge can be delivered in advance of the NDR.

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 annual build figures for the various growth locations on p111 of the JCS, this means that the eco-town could progress to the stage expected of it by mid 2014-15 and the rest of the growth area to the stage expected of it 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?

38. We consider that the JCS would be unsound in stating that there can not be a commitment to large-scale development in the growth triangle until there is certainty over the Northern Distributor Road. The purpose of the JCS is to set out the Councils' strategy for meeting identified growth needs. The JCS will be the Councils' adopted policy and must therefore represent a commitment to working towards delivery of that strategy. If circumstances change, then plans can be reviewed, but in adopting a plan the Councils must be committed to its implementation.

39. In terms of development ahead of the NDR, the JCS should not put absolute barriers in the way of early delivery. The JCS identifies at an appropriate scale the issues to be resolved. Detailed work in relation to sites or growth locations may identify opportunities/mechanisms to overcome perceived barriers, for example, through modal shift.

Table 1: Location of travel from Sprowston Wards (Source: Census 2001)			
Destination Zone	Distance band	AM Peak Trip Distribution (all modes and Journey purposes)	PM Peak Trip Distribution (all modes and Journey purposes)
Sprowston Wards	0-2km	54.5%	24.3%
Norwich city centre (Mancroft ward)	4-5km	11.2%	24.6%
Airport (part of Catton Grove Ward)	5-6km	1.5%	2.1%
Rest within inner ring road	4-7km	8.2%	17.1%
Rest within Outer Ring Road	5-10km	10.3%	16.7%
Broadland Business Park	5-6km	5.3%	1.6%
Rest of Broadland	2-20km	2.4%	3.5%
Rest of Norfolk	10-60km	2.6%	3.7%
Suffolk	30-100km	0.3%	0.4%
London	100km+	0.2%	0.3%
Cambs	30-100km	0.1%	0.1%
Rest of UK	100km+	3.3%	5.5%
Total		100.0%	100.0%