

# Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership

## MATTERS & KEY QUESTIONS FOR EXAMINATION AT THE HEARINGS

### Response from CPRE Norfolk

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**Matter 1 (A) Legal requirements and (B) The spatial vision and the spatial planning objectives (JCS parts 01 & 04, including the key diagram at p29)**

#### **(A) Legal requirements**

**A1** The Local Development Schemes (LDS) have been shown on the individual web sites with a focus on the how it relates to the individual Council. There have been differing degrees of level of information and updating/revisions. There has been no LDS for the GNDP as a whole, and it has been difficult to track the overall activity and changes in timescales for the progression of the DPDs.

**A2** The JCS has been prepared using the processes in the Statements of Community Involvement; but the start point has been the EEP housing numbers and distribution by District, and within this the options have been constrained, and have allowed little opportunity for public engagement in a meaningful way.

**A3** No comment

**A4** The Sustainability Appraisal and Appropriate Assessment have been undertaken. But that for a eco-town at Rackheath appeared to take as a baseline that the NDR (three quarter route) had already been built. In the case of the AA, on water resource and treatment the Environment Agency advice is that this is not sufficient, and the implications of the Water Framework Directive need also to be taken into account.

**A5** The GNDP JCS framework appears to be the start point for the sustainability community strategies, not the individual Councils.

[The revocation of the Regional Spatial Strategy lapsed with the revocation of the East of England Plan. The advice states that: *'Local Planning Authorities will be responsible for establishing the right level of local housing provision for their area and identifying a long term supply of housing land without the burden of regional housing targets....It is important for the planning process to be transparent and for people to be able to understand why decisions have been taken. Local authorities should continue to collect and use reliable information to justify the housing supply policies and defend them during the LDF examination process.'*]

**(B) The spatial vision and spatial planning objectives (JCS parts 01 & 04 and the key diagram).**

**B1** The fixed start point of the JCS process as far as the public are concerned has been, and remains, the RSS housing provision targets and the distribution of these to each Local Authority. The spatial strategy has been progressed on the basis of a very long wish list of infrastructure requirements being implemented. In the changed economic outlook, it is even clearer that the strategy has not been justified, and is not sound. The discussions and decisions of the GNDP Policy Group have not been in the public domain. CPRE consider that an evaluation of the Matters put by the Inspectors leads to the conclusion that this JCS process be abandoned, and a fresh start made taking account of the above Government advice.

**B2** There was some perfunctory identification and consultations on 'reasonable alternatives' for the spatial strategy at the Issues and Options first stage. However, this quickly set into a fixed framework of two different approaches for the north east and south west growth locations; concentration into a new settlement in the north east, and dispersal around existing settlements in the south west. From then on, far from being a clear audit trail demonstrating the decision-making process by which the vision and objectives were derived, they were lost in a fog of secrecy in the Policy Group of the GNDP, the membership of which even was not made clear until late in the day.

**CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.**

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**MATTER 2. Does the JCS make sound provision for housing delivery?  
(Policy 4 and Appendix 6; the housing trajectory)**

#### General Housing

[Inspectors' Comment. GNDP has decided to proceed with the housing figures included in the now revoked East of England Plan, following its judgement that the background justification for them remains sound. GNDP is preparing a topic paper explaining this].

[CPRE Comment. We welcome that the GNDP is preparing this paper, and assume it will be available well before the 9<sup>th</sup> November. We await with interest as to how the GNDP seeks to reconcile the RSS housing figures in light of:

- they were made on condition of very large scale investment in infrastructure (road transport, education and health facilities, affordable housing provision, water resource and waste water treatment, etc
- ambitious job targets
- the economy and housing market would continue to be buoyant, a forever 2007 scenario with rising land and housing values.

**2A** The JCS's planned provision of housing to 2026 is not justified, it would lead to unstructured and badly served housing development, with a particular deficiency in the provision of affordable housing. The recent changes in PPS3 would have two main effects. There will be a reduction of building in the rural parts of the GN area with the removal of windfall provision from garden sites. The removal of a minimum build density of 30 dwellings per hectare may on some sites lead to fewer houses being built on the site; particularly if doing so it gets below a threshold figure for the provision of affordable housing. While CPRE recognise that there is merit in

the changes, it may at the same time introduce some new issues to be addressed.

**2B** PPS3 was revised on the 9<sup>th</sup> June 2010 to take account of the above changes. The revocation of regional strategies did not take place until the 6<sup>th</sup> July, and PPS therefore still retains a number of references to the now defunct regional strategies, and the identification of broad locations and specific site relates to planned housing provision. To remain with current housing numbers and trajectories clearly creates difficulties, and the sooner these are revised the better; otherwise LPAs are locked into making excessive allocations of land, and 'cherry-picking' by developers.

**2C** The only route to a sound JCS is a significant and tested reduction in housing numbers to 2026, an accompanying review of the spatial strategy, and a more effective engagement of the public in the consultation process. The sustainability appraisal would be improved by the bank of knowledge gained in the process to date, not least on waste water treatment in regard to both the Habitats Directive, and the Water Framework Directive.

### **Affordable Housing**

**2D** Policy 4, as amended by GNDP Focussed changes 1-4, clarifies the level of affordable dwellings that will be sought on sites for 5-9 dwellings (20%), 10-15 dwellings (30%) and over 16 dwellings (40%), with approximately 85% social rented and 15% intermediate tenures (FC1). The amended policy states that there is in the plan area a need for about 11,680 affordable homes with approximately 60% of these being social rented, and 40% intermediate tenures from 2008 to 2026 (FC3). This represents 33% of the total housing requirement. The policy target of 40% is stated to be the maximum achievable on sites without subsidy 'under normal market conditions' (FC3), but also claims that the 40% affordable housing target is achievable in a significant number of the scenarios modelled without social housing grant (FC2). I would appear therefore that Policy 4 meets the criteria set out in paragraph 29 for affordable housing.

The key issue therefore becomes the soundness of the judgments in setting the targets in the face of 'viability' issues, and how do these relate to recent past experience.

**2E** We ask the question to what extent the scenarios modelled by Drivers Jonas and Deloitte (July 2010) can be related to the experience of the past few years. The Norfolk County Council Housing Monitor Report for April-March 2009 provides some useful data. In the media South Norfolk was heralded as

a star performer nationally on the basis of the proportion of affordable housing built in 2008/09. However the report (page 8) shows a housing trajectory which fell from 500 total completions in 2001/02 to less than 400 completions per year to 2005/06, with an average annual of 55 affordable dwellings (from table 3, page 24), around 10%.

Housing completions then rose sharply to a peak of 1200 in 2007/08, which included 300 affordable dwellings (25%). Total completions fell to 925 dwellings in 2008/09, but within this the affordable delivery rose to 490 units. This was presumably because on large greenfield sites the affordable element tends to lag those built for private sale.. 'Balancing' the two years, we have 709 affordable dwellings from 2150 completions, a 37% proportion of the overall total completions in South Norfolk.

While this shows a large yield can be obtained from large greenfield sites, it is only possible at the tail-end of an unsustainable boom which leads to a crashing 'bust' and a market and economic environment which it makes it difficult for the build of both private sale housing, and most certainly, affordable housing.

We conclude that a proportion of 40% affordable housing can only be approached on the basis of a continued rapid rise in land values and the housing market, and that it may be many years before we see a repeat of this scenario (which should be avoided in any case). Further in the present economic situation it is unlikely we shall see a massive public subsidy to affordable housing to compensate for the shortfall in developer contributions.

In current conditions, and for the foreseeable future, the targets are simply not achievable, and the more housing that is built, the larger will be the gap between the private sale and affordable housing that will be provided. This is incompatible with the existing need, and aim of housing mix, to provided balanced communities. This is not a viable plan for homes for local people. If nothing else, the GNDP may want to consider the validity of the use of their 'strapline' 'Jobs, homes, prosperity for local people' on all their consultation documents.

We also question in FC3, paragraph 5.28B on what is meant by 'normal market conditions'. The County Council Housing Monitor Report illustrates variations within Districts as an overlay on 'normal market conditions'. Broadland District (page 8, figure 1) in 2001/02 had over 400 completions, which moved downwards to less than 200 a year in 2005/06, and then rose to about 250 a year until 2008/09. Broadland was atypical (with Breckland) in not seeing a sharp peak in completions in 2007/08, followed by a sharp fall in

2008/09, when the property market downfall equated to a Norfolk-wide drop of 32% in completions in one year.

The annual affordable housing completions varied between 70 and 140 in Broadland for the period 201/02 to 2008/09 (Table 3, page 24), at an average of 104 a year. In 2008/09 affordable additions continued to rise in four districts (including Broadland and South Norfolk), reflecting RSL-driven development.

It would be useful to have a breakdown on affordable housing by planning gain on mixed tenure sites, and from public subsidy and RSL. We could then better relate the historic experience in the two funding streams to future projections and targets set. We know for example in North Norfolk, in the period 2001/02 to 2008/09, the provision of affordable housing as a proportion of all housing was 18%. The share of affordable housing that was wholly or in part funded by developer contributions amounted to just 9.6% of the 554 total. Funding from RSL and/or Council yielded 492 dwellings, 90.4% (NNDC AMR 2008/09).

**2F** Focussed Change FC3 at 5.28B sets an policy target of 40% for affordable housing, and a current split of 85:15 for social rented and intermediate tenures; the most recent assessment of need is for approximately 11,860 affordable homes from 2008 to 2026 with a 60:40 split between social rented and intermediate. Paragraph 5.25 gives a breakdown of size of house by number of bedrooms. The approach to developers is set out in terms of the share of affordable housing requested in terms of a range starting at plots with 5 houses. As such, the JCS would appear to fulfil the requirements of PPS3, paragraph 29.

The overall target, policy target, and balance of tenures will be kept under review in light of updated information on housing need. This monitoring process is welcome. However there is little guidance in the JCS, or in PPS3, as to what might be done should the targets go seriously astray, eg on viability grounds.

**2G** There is no justification for the JCS including housing for sale in the definition of AH, as at Appendix 9, the glossary. The June 2010 PPS3 in Annex B does not include private sale housing in the definition of affordable housing, and is restricted to social rented housing and intermediate affordable housing. It also adds that *'The terms affordability' and 'affordable housing' have different meanings. 'Affordability' is a measure of whether housing may be afforded by certain groups of households. 'Affordable housing' refers to particular products outside the main housing market.*

**2H** Policy 4 makes the reference to 'appropriate settlements' for exceptions policy affordable housing. The proposal at pg. 79 indicates that the settlement hierarchy is main towns, key service centres, service villages and linked service villages. Paragraph 5.30 states that exceptions sites might be allocated through Site Specific Proposals. They will also 'be considered in settlements classified in the hierarchy as Other Villages and above, whilst applications will also be considered in other locations if appropriate'. The short answer would appear to be that sites considered for exceptions policy housing could be anywhere, with little indication of what might be 'appropriate'.

FC4 makes an addition to the end of paragraph 5.30 of the JCS: *'On the evidence of recent achievements and the programmed schemes in mid 2010, this (exceptions policy housing) is likely to produce about 1170 affordable homes between 2008 and 2026, though this is subject to the availability of funding'*.

The submission JCS at Appendix 6, Housing Trajectory shows total housing completions for his period at 39,571 dwellings. The total required commitment is given at page 43 as 35,660 dwellings, and new commitments as 36,820-37,750 dwellings. Within this will be affordable housing, and this will include some exception policy housing.

If we take a round figure of 37,000 dwellings to be completed between 2008 and 2026, then 1170 exception sites affordable housing would represent 3.2% of the total housing provision in the Greater Norwich Area. However exception housing will very largely occur in the rural, non-NPA parts of Broadland and South Norfolk. The completed plus total allocated dwellings in the non-NPA amounts to 5,700 dwellings (2,159+3,541, see submission document, page 43). This would imply that 20.5% of housing in rural areas arises from exception policy sites in the period 2008-2026. Both number and percentage seem high on a historic basis for rural areas in Norfolk, even with a very elastic definition of 'appropriate' as regards the sites that may be used.

**2J** The JCS is unsound as regards affordable housing. **Total** housing numbers from 2008-2026 should be revised down in line with market conditions, and infrastructure and environmental constraints. Within this a greater degree of priority needs to be given to the provision of affordable housing, with a lesser dependence on developer viability conditions which in a great many cases will not be met. However, it is also clear that this would have major implications on levels of public subsidy, which is a decision for national Government. Apart from social and cost considerations, an increased level of public subsidy would help a construction industry with major problems, and faced with a long term loss of skills in the workforce.

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**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** The absolute and comparative quantities of growth distributed to the main locations are not the most appropriate, and are not founded on a robust and credible evidence base. Overall housing provision greatly exceeds past historic highs, and is assumed to continue in this mode over the plan life. It is by no means clear that the expectations and plans for new jobs delivery can be achieved.

The spatial strategy has never set out a convincing case why housing and job growth should be so concentrated in the north east sector, whilst there is more of a dispersal approach in the south west sector.

The basis of the plan goes back to 2005, and it was conceived through RSS to the setting up of the GNDP approach in a very different economic situation and expectations. There has been no concession and re-think on the plan in the changed circumstances, only to re-iterate it depends on the perceived infrastructure requirements being fully met.

**A2** Neither the level or pattern of development is deliverable in infrastructure and market terms. The very long list of infrastructure needs is not costed except for road schemes (approaching £300 million); there are no differentials between 'critical' in terms of need and the pathway to the delivery (except for road schemes); necessary; desirable; would be nice to have. There appears to have been no serious re-evaluation of the JCS in terms of the changed economic circumstances, and a difficult and uncertain housing (and jobs) market.

**A3** There is no clear indication in the JCS how proposals may be advanced, delayed or modified; although they are subject to monitoring and review. The general impression is inclined more to it will happen, or will not happen, depending on the delivery of the infrastructure, which covers a wide range of needs covering a number of different bodies and funding sources. This is particularly emphatic for the north east sector, but is also true for the South Norfolk growth centres.

**A4** The statement at paragraph 6.17 *'There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth'*. The 'key dependencies' most emphasised are roads orientated. They are the Postwick Hub and NDR in the north east; and the road junctions on the A47 southern bypass, and a bypass for Long Stratton. Public transport in both cost and delivery timescales takes very much second place. There are other 'key dependencies' which should be better focussed. Some of these should be satisfied before land is released for major growth. We would place in this category affordable housing, water resource and waste water treatment works, and in the 'soft' category, primary and secondary education.

**A5** The allocation of 1800 dwellings to smaller sites in the South Norfolk NPA, 'and possible additions to named growth locations', is a fudge factor. This may be because it will be difficult to place 1800 dwellings in small sites, especially now with the removal of garden sites from PDL. It also avoids placing a higher allocation than now stated in Wymondham (2,200), Long Stratton (1,800), Cringleford (1,200), Hethersett (1,000) and Easton/Costessey (1,000).

**A6** The suggested change would better reflect the function and purpose of the Community Infrastructure Levy Regulations 2010, which is to service what the development which it generates, rather than repair existing deficiencies, which is the thrust of the JCS sentence. It may that in doing performing this function there are some second order benefits to existing residents.

## **Part B. Old Catton/Sprowston/Rackheath/Thorpe St Andrew growth triangle (part policy 10 and appendix 5**

### **Procedure**

**B1** The GNDP Focussed Changes 8-10 for policy 10 and appendix 5 do NOT provide a sound procedural basis for the strategic allocation of the growth, nor an appropriate level of guidance for taking development forward in a

coordinated way without an APP through future detailed master planning of the various 'quarters'.

The substitution of the word 'location' by 'strategic allocation' in FC8 means in practice that instead of a public consultation on the growth triangle (which would happen with an Area Action Plan) there will be no public consultation (which can happen with a Supplementary Planning Document). This could be challenged in the Courts as to legality. It is certainly neither justified nor effective; and it continues the lack of transparency throughout the process to date.

The reasoning for the course of action is set out in the minutes of the Broadland Cabinet meeting of the 22<sup>nd</sup> December 2009: *An alternative to the production of an AAP was the production of an SPD which would give Broadland the opportunity to ensure that its objectives for the growth triangle were achieved and improved the rate at which the planning framework could be developed. This strategy has been pursued by other planning authorities in England. Whilst it was noted that there were two key risks associated with the development of an SPD as opposed to an AAP, the benefits were considered to outweigh the disadvantages.*

There is no record of what were the two key risks; perhaps one a legal challenge, perhaps the other that the approach might be considered to be unsound at the public examination stage.

The amended FC8 deletes *'This location will deliver an urban extension extending on both sides of the Northern Distributor Road.* The replacement text says: *This strategic allocation will deliver an urban extension extending on both sides of the Northern Distributor Road, within the area shown in appendix 5.*

Whether the growth triangle is a 'location' or a 'strategic allocation' it is in the view of the GNDP dependent on the provision of an NDR. However the Secretaries of State (CLG and DfT) decision letter of the 2nd August casts some doubt on the provision of the NDR in relation to the draft orders on the slip and side roads. The Secretaries of State say (point 4) that *they are satisfied that in the circumstances of the case the remaining objections raise issues of such significant public importance that they should be debated publicly at a local inquiry and an inquiry is likely to produce significant new information relevant to their decision.*

Further they say at point 5 that *It has therefore been decided that until the Government's spending review has been concluded, the Department for Transport will not be in a position to identify those major projects which it can support, consistent with the Government's objectives. In view of the uncertainty over the*

*availability of the funding for the scheme, it has been decided to defer, for the time being, the holding of the local inquiry.*

The Northern Distributor Road is set by the JCS as a fundamental requirement for the scale and location/allocation of development in the north east sector, and indeed for the overall spatial strategy for the Norwich Policy Area. There is no 'plan B'. We consider therefore that the whole Core Strategy is unsound, and the Government decision on the inquiry supports the case for the withdrawal and review of the JCS; if the result of the spending review is that the NDR is either put 'on hold' or abandoned there can be no other option.

### **Soundness of the proposal**

**B2** FC 9 and FC 10 introduce a Concept Statement for the growth area, and replace appendix 5 in the JCS with a 14 page Concept Statement. The reason for the FC10 Concept Statement is *'to provide more detailed guidance to support the strategic allocation of the Old Catton, Rackheath, Sprowston, Thorpe St Andrew growth triangle'*.

There is chasm between the Concept Statement and the proposed 'detailed master planning' for the 'quarters', with no indication of the pathway and interaction of measures in moving from concept to implementation. As such the strategic allocation approach is not justified, and not effective. The absence of public consultation both further weakens the development of sound detailed plans and their implementation, and the lack of transparency inherent in the process is against national policy (most recently the 6<sup>th</sup> July statement on the revocation of the regional strategy).

**B3** The rationale provided in the Concept Statement for the strategic allocation has a number of flaws, including:

- the argument that more housing necessarily equals more affordable housing in order to meet housing need, an argument frequently employed while in practice the gap between provision and need has widened over many years (point 3)
- applying the PPS3 five year land supply guidance in relation to a JCS which seeks to achieve a housing trajectory which is not achievable in economic (and environmental) terms for both the housing provision and the required infrastructure to support it; and in light of a circular relationship between the proposed housing numbers, the projected rate of build, and the five year supply requirement (and beyond). An

- unrealistically high allocation of land leads to disjointed and unbalanced development through 'cherry-picking' of sites (point 3)
- the feasibility of respecting the character and landscape of an area with a plan that envisages such a fast and high level of growth (points 4 and 5)
- the Appropriate Assessment of the JCS under the Habitats Regulations is not sufficient in that there is also the need now to account for the Water Framework Directive and consider potential impacts on the wider water environment. Treatment of waste water, and water resource, is the key issue. We note that the need for mitigation against increased visitor pressure on sensitive Broadland habitats can arise both through this effect as well as the physical disturbance impact that is mentioned (point 7)
- movement along the NDR: the role and dependence on the provision of the NDR are unsound. Public transport based alternatives have not been properly assessed. There is also an overly optimistic view that the NDR will be provided. *A Northern Distributor Road has been proposed for Norwich for some time. It has been awarded programme entry status by the DfT. Funding for the construction of the Postwick Hub has been made available by the Government. As a longstanding element of the Norwich Area Transportation Strategy it is part of the "baseline" for the development strategy (point 10)*
- a Vision which is overly rosy and unrealistic in many aspects in stating that: *The Growth Triangle will have developed into a special, distinct and exciting place through the delivery of 7,000 new homes by 2026 and continuing to grow to around about 10,000 new homes thereafter. Alongside housing, employment opportunities, services, facilities and key infrastructure will have been delivered across three or four main development centres. Development within the Growth Triangle will grow out of and reflect existing places and communities (page 13).*

The first map in the FC10 shows the extent (boundary) of the growth triangle. The second map gives an illustration of areas of green space, all of which are existing landscapes/habitats, but in the central area to be bisected by the NDR. The third map shows key transport routes, which includes the NDR and two proposed lengths of link road which run parallel but nearer the existing urban fringe. The existing rail line is shown and a proposed BRT which would run to Rackheath. The fourth map shows constraints and opportunities for new development, in which the proposed eco-community features largely in the 'break-out' area on the north side of the proposed NDR. The main constraint is the airport noise and safety zone in the north west part of the area. The linkage between the Concept Statement and the maps is diffuse.

## Transport issues related to the growth triangle

**B4** The NDR is not justified and effective as the 'means of providing the necessary access to key strategic employment and growth locations'. The NDR would reinforce car dependency and create new orbital movements in conjunction with the A47 southern bypass; for example car travel between housing growth in the north east of Norwich and the strategic employment allocations located to the southwest of the city. Rather than reduce congestion, the NDR Business Case shows that there would be some increase in traffic across Norwich, and there would be a substantial traffic increase on the radial roads in the north east.

**B5** Rather than make room for significant improvement to public transport in Norwich, and particularly North Norwich, it would squeeze it out. There is first of all the impact of 'less space' on the highways. Secondly that the indicative timescales to implementation in the Transport for Norwich consultation (November 09) showed the Postwick Hub would come in 2010, the NDR 2012-15, and public transport measures subsequent to that; BRT routes would be introduced between 2012 and 2020 (only the A47 Dereham Road scheme earlier). This sequence would exacerbate car dependency. An NDR would produce an additional 25,000 tonnes of CO2 emissions a year.

A more effective transport package would involve the phased implementation of bus Rapid Transport for linking up centres of major housing growth, the city centre, and the strategic employment locations traffic management, improved walking and cycling facilities, modest new road infrastructure, and additional park-and-ride facilities. The network of 6 park-and-ride sites around Norwich has played a major role in reducing the amount of traffic crossing over the inner ring road and into the city by 20% in the past ten years.

The eco-town is planned to have a high degree of self-containment. The fact that it is outside the current public transport infrastructure would militate against usage, and it would be appropriate to seek to step-wise increase public transport provision with growth of the proposed town. The biggest deterrent to usage would be the presence of a dual carriageway road across the town and the promotion of the use of the car this would have. The rail halt might be used more from commuters from north Norfolk going to work in the eco-town (which might pull jobs that would otherwise be located in North Walsham or Cromer) than those travelling into Norwich to work. Whatever the intended modal shift to public transport in present plans, the outcome (as indicated by an analysis of the MSBC data) is that the shift is in the wrong direction.

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

**B7** NDR is referred to many times in the JCS and other documents as being fundamental to the delivery of the JCS. Over a period of time it has gone from a full west-east bypass to a three quarter route to a half route from Airport to the eastern end. It is by no means clear if this will be approved, delayed or rejected. CPRE are clearly of the view that it should be the latter. The GNDR have embraced just one outcome, that there would be an approval. There are no other alternative plans or contingencies should it be delayed or rejected on grounds of cost and/or a lack of effectiveness. There is no flexibility in the JCS as regards the delivery of the growth triangle; it is presented as all or nothing.

**B8** It is not sensible or practical to make housing starts based on the requirements of a long term strategy that is entirely dependent on the delivery of the Postwick Hub as currently designed and a binding commitment on the NDR. Within the quoted 2,200 dwellings, only those which can be independent of the infrastructure premise should be eligible for planning permission.

There should be no development of a 1,000 houses at Rackheath as a start on a strategy which may not be sound and deliverable. In fact, it may be that no developer would be prepared to embark on such a course given the investment implications for an exemplar low carbon development (and water conservation measures). This would be exacerbated by the proposition (paragraph 48) that the development at Rackheath should progress concurrently in all 'quarters'.

The £25m cost of the Postwick Hub is predicated on being part of the NDR (although separately funded). For other strategies (eg public transport led) involving the deletion of the NDR, the Hub is heavily over-engineered, a point accepted by the DfT. While some relatively modest improvements are required at this junction, these would be much simpler and less costly to design and build.

**B9** Infrastructure for water resource, and in particular for waste water treatment plant, is not specific to the precise location of development in the north east. However the level and rate of build and the need for increased capacity of the infrastructure has major implications for the investment process. It maybe that a modest amount of build can be accommodated within existing capacity, but any small increase beyond this would trigger a requirement for major expenditure, which would have to be justified, and

take time to be planned into future programmes. Similar considerations might apply to the provision of education facilities.

### **Other issues**

**B10** The JCS submission document is deeply flawed in relation to the growth triangle (and elsewhere). It needs a comprehensive review which engages with the public in an open-minded and transparent process. In our view this would encompass consideration on major reductions in planned housing growth; a review of the economy and job prospects, and the relationship of new jobs to housing provision; a more incremental and organic expansion for the north east which is 'tighter' to the current urban fringe, and in particular the removal of the very large 'spike' area around Rackheath; a transport strategy which is public transport led and embraces the whole of Greater Norwich; and no NDR, but modest road schemes which would integrate with the public transport alternative. Within this there could still be an eco-village, as an exemplar to promote the progressive raising of standards in energy and water savings in the existing housing stock.

### **Part C. Other major growth locations in policy 10**

#### **Wymondham**

**A** The justification for the growth proposals at Wymondham, and the other growth locations to the south west of Norwich, is through a mix of reasons, some of which are constraints. The Yare valley dictates against the extension of the urban fringe, and the town is free standing. At paragraph 6.13 the JCS states: *Growth locations have been selected because they provide the opportunity for easy access to strategic employment opportunities and high quality public transport routes, do not compromise high quality habitats or mineral resources and are not at risk by fluvial flooding*. *A range of locations are proposed to provide a reasonable level of choice for people and the development industry*.

CPRE consider that there needs to be a justification for the level of housing provision (not just what the RSS says) at Wymondham and the other growth locations as well as for the location of sites. This involves also an appraisal of the employment prospects and estimates of new job growth at the various strategic employment sites in the vicinity. The 'choice' factor needs to take account of potential spread of new infrastructure requirements.

**B** To avoid undue repetition we refer first to the common infrastructure requirements for growth at Wymondham and other South Norfolk growth locations together, and then deal with any specifics to a location separately.

Paragraph 6.17 to 6.23 sets out 'key dependencies' and 6.17 states that *'There must be a clear commitment to fund and implement key infrastructure as identified in the policy before land is released for major growth'*. Para 6.18 starts the list with: *'To implement the JCS significant highway improvements are required at the Longwater (A1074), Thickthorn (A11) and Harford (A140) junctions on the A47 Norwich Southern Bypass*. The list extends to a range of public transport measures (including BRT) cycling and walking networks.

There is a need for secondary schools for provision of growth at Wymondham, Costessey and Hethersett where all are on constrained sites; the preferred approach may require the relocation of all three schools to facilitate the expansion. It goes on to say 'utilities such as water and electricity are critical and development can not take place without them'; 'key requirements include environmental improvements sewage treatment works'; 'a wide range of services and infrastructure is needed to create a balanced community'; 'these are not all listed above'.

The conclusion is that 'it will be alright on the night'; this is a paraphrase of *'Timing for delivery will be a matter for the masterplanning process and ongoing management by the GNP'*.

Specific to Wymondham, Policy 10 states that the expansion of the town will include:

- expansion of the town centre of a quality that will retain and enhance the distinctive character of the existing historic centre
- extensive levels of green infrastructure to create a 'Ketts Country' pastoral landscape
- new pre-school provision and new primary school
- expanded household waste recycling facility.

The implementation of the planned new growth is shown at page 111 as being 185 housing units per year, starting, as for all growth locations (except Rackheath which is earlier), in 2014/15 and running through to 2025/26.

There can be little confidence that this level of growth can be sustained for Wymondham with the 'key dependency' infrastructure requirements that are set out; and more so when taken into the context of the similar basic list in other locations. Further the masterplanning delivery mechanism lacks substance.

C The soundness of the individual proposals for growth in South Norfolk need to be looked at in their totality. The overall level and rate of growth can

not be justified, and there should be a reduction in housing provision. Whether this takes place as an overall 'proportionate' reduction, or varying and selective reductions on the locations, or some other re-balancing of the total provision for the NPA in South Norfolk requires more detailed considerations and consultation. Taking into account both job growth and infrastructure considerations, if the 2,200 number was to be retained in Wymondham, then reductions would be required elsewhere.

### **Hethersett**

**D** The 'specific' policy 10 requirements for Hethersett are a long distance cycle access to the City Centre, Hethel, Wymondham, Norwich Research Centre and the hospital; and green infrastructure access to the countryside. The policy states that 'at least' 1,000 dwellings '*will deliver modest growth to the existing village*'.

Hethersett is defined as a Key Service Centre (policy 14) which are in the main planned to expand within a range of 50-200 dwellings. The exceptions are Hethersett and Long Stratton with 'at least' 1,000 and 1,800 respectively; plus they are marked\* to show they may help to deliver 'the smaller sites in the NPA' allowance. We would argue that the level of provision of housing for Hethersett is clearly excessive in relation to its role as a Key Service Village in the hierarchy of centres.

**E** The level of growth for Hethersett can not be justified, and should be reduced in line with the range to be found in other 'same order' settlements. The infrastructure claims are in part 'competitive' with those made for other locations.

**F** The housing provision should be decreased in line with the status in the settlement hierarchy.

### **Cringleford**

**G** The case is not made but the village is close to major centres of employment at the hospital and Science Park

**H** There are some common infrastructure requirements to Hethersett. The levels and trajectory of housing provision from 2015/16 to 2025/26 looks to be feasible.

### **Public transport in the A11 corridor**

**K** There is a long history of commuting along the A11 corridor from Attleborough to Norwich, in spite of relatively good provision of public transport, bus and rail. The success of a scheme such as BRT is in part determined by a choice which is less weighted in favour of the car than it is now, and increasingly in favour of the use (and hence financial viability) of public transport options. This is part of the package of enhancing transport provision while reducing travel need and impact.

### **Long Stratton**

**L** There are no justified proposals for the proposed scale of growth at Long Stratton in spatial strategy terms. The Sustainability Appraisal makes a number of valid points. The proposed provision of 1800 houses is an untenable pragmatic approach to funding a bypass.

**M** We comment as above at D (Hethersett). The planned provision is incompatible with the role in the settlement hierarchy.

**N** The growth proposal should be dropped. The question of whether to pursue a bypass or seek alternative measures to reduce traffic problems in Long Stratton is a separate issue. We would prefer the latter approach, both on environmental grounds and the likely timescale in which to achieve some improvement.

### **Easton/Costessey**

**Q** The JCS does not explicitly provide justification, but as for Cringleford they are urban fringe parishes close to strategic employment sites, including the city centre. There are in place decent bus public transport services.

**R** Connections could be improved by the proposed BRT to the city centre via the Dereham Road; enhanced bus and cycle links to City Centre, Easton College, Norwich Research Park, and secondary schools; and cycle routes and pedestrian access to the Longwater and Bowthorpe employment area.

**S** The housing numbers and trajectory from 2014/15 to 2021/22 are feasible.

**CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.**

# **Examination into the Joint Core Strategy for Broadland, Norwich and South Norfolk produced by the Greater Norwich Development Partnership**

## **MATTERS & KEY QUESTIONS FOR EXAMINATION AT THE HEARINGS**

### **Response from CPRE Norfolk**

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#### **MATTER 4 Infrastructure delivery (the JCS generally and policy 20 & Appendices 7 & 8 in particular**

A The JCS does not attempt to distinguish between what is 'critical' as regards the provision of infrastructure to the delivery of growth, and what is desirable. There are no delivery frameworks and mechanisms for drawing together the various measures required from various bodies in a timely and effective manner within an overall timescale. There are no evaluations of estimated costs other than major road schemes. The list of infrastructure requirements is long and repetitive, and applies to all growth locations in various degrees. This is brought out in detail in our comments throughout Matter 3 in particular, and also to Matters 2 and 6. To avoid undue repetition, we do not go into further detail here.

**CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.**

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#### **MATTER 6 Norwich City Centre (policy 11) and the remainder of the Norwich Urban Area Parishes (policy 12)**

A The JCS does not present a clear and justified core strategic guidance of the City Centre; nor for the city as a whole does it consider the interactions with other housing and employment growth locations in the NPA, other than being the geographical centre, as displayed by the figure at page 59. The Norwich City Centre key diagram is displayed at page 73. It is essentially bounded by the inner ring road, but with Anglia Square (in part) and Brazen Gate lying outside. The Northern City Centre, which includes the Anglia Square Area, is to be developed as an Area Action Plan (contrast Rackheath). The St Stephens Area will be developed with its masterplan, and will be adopted as a Supplementary Planning Document.

There is an emphasis on extending and building on the existing strengths of retail and commercial development, with at least 100,000sqm of new offices to accommodate for uses including media, creative, financial, business and professional services, and information communication industries. Significant retail expansion is expected in comparison and, to a lesser extent, convenience products. These ambitions need to be evaluated against the current expectations for the economy as a whole and the market in these areas; the effect of competition through major employment and housing growth in the north east sector; and the fact that just 2,750 dwellings are planned for the city centre between 2008 and 2026.

The tourist and visitor sector would be expected to be more buoyant, with a significant uniqueness factor, and would benefit from the regeneration of historic but run-down areas in need of regeneration; plus the ambition for concert and conference facilities. This should be combined with continuing improvements by public transport as the hub within the Greater Norwich Area.

**B** The current focus of Riverside is retail and leisure, especially the evening economy. There is no explanation for some move to commercial, and particularly an expansion is envisaged for the evening economy. The Brazen Gate complex appears to show no change. Overall, the function of all areas should be reviewed in light of changing economic circumstances.

**C** While dealing with the City Centre in policy 11, and the urban fringe parishes in policy 10 and a re-cap in policy 12, little is said about the remainder of Norwich. The new housing commitments for Norwich (page 43) for the period 2008-2026 are 8,592; the Broadland NPA 11,099; and South Norfolk NPA 13,156. We ask if this distribution is the best that can be done in utilising Norwich for the provision of housing in the NPA. We suggest that while total NPA dwelling provision should see a significant overall reduction, that within the city boundaries it could and should be increased.

The statements in policy 12 on the rest of Norwich are general and mundane, such as to identify and regenerate tired suburbs and promote neighbourhood-based renewal. Priorities for regeneration are given as the northern wedge area, western area and east Norwich. There are no indications on what the measures will be; and given all the infrastructure required for new development, what might be required and the viability on cost considerations.

**D** Soundness for the JCS for the City Centre requires consideration of the points made at A above; and in point C above for the bulk of the parishes. More needs to be said on the impacts on the urban fringe parishes affected by major new development, other than the claim that the NDR would relieve traffic congestion in the north east sector.

**CPRE Norfolk have given input to the Joint Core Strategy consultation process at every stage and have a keen interest in its outcome, given our objective of protecting and enhancing the environment. As such, we would like a seat at the table for this matter.**