

**Joint Core Strategy for Broadland, Norwich and South Norfolk  
Summary Report of Evidence and Technical Consultation Reg 25**

This document explains the process that has been followed since the GNDP Policy Group met in July 2008. It covers the Joint Core Strategy Regulation 25 Technical Consultation and provides evidence for a decision to be made for moving to the next stage.

**1. Introduction**

- 1.1 At previous meetings of the GNDP policy group on 24<sup>th</sup> June and 18<sup>th</sup> July 2008, members confirmed how they wished to move forward on the emerging joint core strategy. To follow new plan-making procedures Members approved a targeted six-week consultation over the summer with technical bodies and other organisations. In addition the opportunity was taken to gather further evidence about the options.
- 1.2 Each potential option for major development in the Norwich Policy Area has been evaluated separately. Much of the growth strategy, particularly in the North East and the city, is common across all 3 options.
- 1.3 As much new development as possible should be located in the City of Norwich as it is a highly sustainable location. Development in the city must have regard to the mix of uses that benefit from a city centre location such as offices or shopping. Work has been carried out and is continuing to assess the capacity of the city (and especially the city centre) for new development. At present there is a high degree of confidence about these long-term estimates for housing capacity and this will be refined through regular development monitoring and viability assessment of new sites.
- 1.4 In Broadland the focus of development is in the north east sector. This builds on work undertaken at the Issues and Options stage of the joint core strategy and the early preparation of a core strategy for Broadland alone. Locations for growth to the north east of Norwich are supported by the evidence gathered to date
- 1.5 In parallel, the government has been consulting on potential new eco-communities and has indicated its provisional support for a new eco-community at Rackheath. The initial assessment undertaken by the government tends to support the north east quadrant as an appropriate location. This has caused some concern locally but it has to be made clear that, if progressed, the eco-community would contribute to the housing requirement of the joint core strategy and is not in addition. Conversely, if the eco-community were not to proceed at Rackheath, a corresponding housing allocation would still be required.

- 1.6 In South Norfolk the pattern of development is modest growth based on larger towns and in places close to the Norwich urban area. The three options consulted on provided a choice of locations and scales of growth within the South Norfolk part of the NPA.
- 1.7 This report is a significant milestone in preparing the joint core strategy for Broadland, Norwich and South Norfolk. The decisions Members make now will allow the Partnership to continue moving forward on the strategy. The spatial vision, objectives, growth options and policies which underpin strategy will be subject to further public engagement under Regulation 25 as suggested by the government office (letter from GO-East dated 30<sup>th</sup> September 2008 and attached to this report). This will enable the GNDP to confirm its intended strategy for regeneration, development and growth across the three districts before submitting it to the Secretary of State. The accompanying joint core strategy 'report on evidence' provides essential background information to enable members to make an informed decision on a single favoured option for large scale housing and jobs growth in the Norwich Policy Area.

## **2. Work since 18 July**

- 2.1 A consultation targeting 1250 specific technical experts, developers, service providers and community groups was undertaken.
- 2.2 A leaflet explaining the current status of the joint core strategy was issued to all householders and businesses in the three districts. While not specifically invited to respond at this stage, a small number replied.
- 2.3 All responses received within the consultation period have been summarised and are included in a separate report which is available for Members' inspection. Some of this required clarification which has been obtained through meetings or further correspondence.
- 2.4 The Sustainability Appraisal has been developed further for the three options for the distribution of growth in the Norwich Policy Area. The Sustainability Appraisal methodology and approach has been independently audited by consultants Scott Wilson.
- 2.5 Additional reports were completed on specific topics:
- Greater Norwich Joint Core Strategy Public Transport Requirements for Growth
  - Water Cycle Study Stage 2a
  - Employment Growth and Employment Sites and Premises Study.
  - A47 Southern Bypass Junctions Capacity Assessment Report
- 2.6 Additional discussions to clarify points and request additional evidence were also held with:
- Development interests in the north east (inside and outside the NDR)
  - Development interests in Long Stratton

- Development interests in the south west (including three different proposals)
- Development interests in the south (Mangreen / Swardeston / Mulbarton)
- Children's Services (Education)
- Network Rail
- National Express (Rail operator)
- Norfolk Constabulary
- NHS Norfolk (Primary Care)
- English Heritage

### **3. Updated Housing Figures**

- 3.1 The housing figures were updated as part of the regular cycle of annual monitoring reports to take account of the most recent housing monitoring data. The revised figures indicate that the number of new allocations required for the Norwich Policy Area could be reduced from 24,000 to 21,000. The detailed figures for housing completions and commitments in the NPA as at 31<sup>st</sup> March for both 2006 and 2008 and trajectories for the three options are provided as appendix b in the accompanying 'evidence' report.
- 3.2 The difference between the two figures stems from two different sources, the first being higher housing density than expected on completed sites and the second being the use of housing trajectory information rather than housing land availability registers. Housing trajectory is a relatively new methodology that has been subject to a very rigorous examination in the last few months. Housing trajectory information is published in district councils' Annual Monitoring Reports.
- 3.3 In the past a significant proportion of housing completions in the rural areas has come from windfall developments. We need to allocate sufficient land to meet the minimum regional housing requirement. Policies in the rural area will be flexible enough to allow windfall development to continue. This means that the overall level of development will be higher than the RSS requirement. The table shows more development in rural South Norfolk than in Broadland which reflects the settlement hierarchy and the larger number of rural parishes in South Norfolk.

### **4. Joint Local Strategic Partnership Consultation**

- 4.1 To ensure continued engagement with Local Strategic Partnerships, a joint event was held on 29<sup>th</sup> September 2008 for members of the three local strategic partnerships and the county strategic partnership. The briefing informed them about the current work on the joint core strategy. Members were invited to contribute to the development of the strategy with their views about principles for development and prioritising infrastructure.
- 4.2 Partnership members revisited the principles of development that were first published in the Issues and Options consultation. All principles are still relevant; but members recognised that there were interrelationships

and dependencies between the first four principles (accessibility, job proximity, infrastructure and service planning & delivery, environmental impact). These four were recognised as being people-focussed and reflected what was needed to build and enjoy a sustainable community. Community and quality of life was not explicit in any of the principles and should be included in the list as should sustainability. Within the 'infrastructure' principle, timely delivery of infrastructure was seen as essential and growth needs to be of a sufficient scale to ensure that the full range of supporting infrastructure can be provided. The other three principles (market delivery, timescales and resources) were more linked to process rather than communities.

- 4.3 Members were also asked about prioritising infrastructure. Partnerships concluded that all infrastructure is essential for the delivery of sustainable communities. Larger scale development was considered to be better able to deliver the full range of infrastructure. Service providers need to be more flexible and joined up in their approach to delivery which could help deliver multi-use buildings and spaces at the heart of developments. This could help reduce the costs of infrastructure and help efficiencies. Transport was seen as very important but there was a desire to see strategic schemes (such as the A11 dualling) specifically mentioned. Green infrastructure is essential to community health and well being.

## **5. Review of the regional spatial strategy**

- 5.1 The East of England Regional Assembly has commenced an early review of the East of England Plan (adopted May 2008). This is the subject of a separate report to the GNDP. As an early part of this review EERA has issued a 'call for sites' which has generated considerable local interest and led to some confusion with our joint core strategy process.

## **6. Next steps & timetable**

Members are asked to agree a single favoured option based on the evidence gathered in order to go forward for full public consultation and further technical work in preparation for the submission stage.

The soundness of the joint core strategy requires effective public engagement. On advice from Go-East a further round of public consultation will be held. It is proposed that this will be advertised widely through the local press and broadcast media. This will invite people to take part in the consultation through the GNDP's website and at public exhibitions that will be held across the area.

- 6.3 Technical consultees will be invited to comment on the favoured growth option for the Norwich Policy Area, while all other stakeholders and the public will be invited to take part in a web-based consultation on the whole joint core strategy. Paper copies of all documents will be available for people attending exhibitions, or on request.

- 6.4 The challenging timescale means the consultation document will not be fully updated at this stage to take account of the technical evidence submitted during August and September 2008. The public will be invited to comment on a similar version of the joint core strategy as technical consultees but with the inclusion of the favoured growth option for the NPA. Comments at this stage will add to the evidence and knowledge from technical consultees and the whole plan will be redrafted before pre-submission consultation.
- 6.5 This additional stage of consultation will affect the overall timetable for the strategy. The timetable for the remaining key stages will be confirmed when the GNDP's favoured option is determined:

Jan 2009 – March 2009	Public consultation - 8 weeks (Regulation 25 second stage)
Jan 2009 – July 2009	Further technical work, preparation of submission document and sign-off
Aug 2009 – Sept 2009	Pre-submission consultation - 8 weeks
October 2009	Submit draft plan to Secretary of State
March 2010	Pre-examination meeting
June 2010	Public examination starts
September 2010	Inspector's report

## **7. Action required**

### **7.1 Members are asked**

- to agree a single favoured option based on the evidence gathered in order to go forward for full public consultation and further technical work in preparation for the submission stage.
- to delegate to Directors the details of the process to be followed to the next stage.
- to recommend these actions for endorsement by the constituent authorities

### **Supporting documents**

- Evidence Report
- Greater Norwich Joint Core Strategy Public Transport Requirements for Growth
- Water Cycle Study Stage 2a
- Greater Norwich Employment Growth and Employment Sites and Premises Study.
- A47 Southern Bypass Junctions Capacity Assessment Report
- Sustainability Appraisal
- Technical Consultation: Regulation 25 – Final Draft report

1<sup>st</sup> December 2008

# Greater Norwich Development Partnership

Joint Core Strategy for Broadland, Norwich  
and South Norfolk

## Regulation 25 Consultation: Evidence Report

Report to GNDP Policy Group 18 December 2008

Version 1.0  
12 December 2008

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# 1. Report structure

1.1 This report highlights the information and evidence that has come forward from a wide range of sources including the recent Regulation 25 consultation. Summaries of the additional evidence gathered are contained in the appendices to this report.

## Housing context

1.2 There are significant similarities between the three options. Consequently, many of the advantages and disadvantages outlined below are common across them.

1.3 The following section looks at the 3 options as presented in the Regulation 25 consultation:

<b>Location</b>	<b>Option 1 (after 2026)</b>	<b>Option 2 (after 2026)</b>	<b>Option 3 (after 2026)</b>
Norwich	4,000	4,000	4,000
Broadland smaller sites	2,000	2,000	3,000
South Norfolk smaller sites	2,000	2,000	2,000
North East (Sprowston/Rackheath area)	6,000 (+4000)	6,000 (+4000)	6,000 (+4000)
South West (Hethersett/Little Melton area)	4,000 (+3000)	4,000 (+3000)	
South (Mangreen/Swardeston/ Mulbarton /Swainthorpe area)			4,500
Wymondham	4,000 (+1000)	2,000	2,000
West (Costessey/Easton area)	2,000	2,000	1,000
Long Stratton		2,000	1,500
<b>TOTAL</b>	<b>24,000 (+8000)</b>	<b>24,000 (+7000)</b>	<b>24,000 (+4000)</b>

## Employment context

1.4 The Greater Norwich Employment Growth and Employment Sites and Premises Study undertaken by Arup, indicates that the total requirement for employment land across the Greater Norwich Development Partnership area in the period 2007 to 2026 ranges from about 230 hectares to 250 hectares. The lower requirement is derived from economic forecasts constrained to the number of planned new dwellings while the upper level is unconstrained by dwellings provision.

1.5 Recommended levels of new office provision in the City Centre accounts for the equivalent of about 10 hectares of this land requirement. Consequently, the maximum level of land allocation required outside the City Centre is around 240 hectares.



- 1.6 Monitoring indicates that the current employment land commitment across the Greater Norwich Development Partnership is about 205 hectares. Consequently, to deliver the overall level of land required there is a need for a minimum of 35 hectares of new allocations.
- 1.7 Significant caution is advised on over-allocation as employment land for which there is no demonstrable need will come under pressure for housing development. This will be difficult to resist. However, there are qualitative reasons for some new allocations including issues relating to specific locations and sectors, and the current limited availability of large plots. New allocations could include:
- New strategic development close to Norwich Airport, as indicated in the Regional Spatial Strategy and recommended by Arup. This could be in the region of 30-50 hectares
  - Expansion of Broadland Business Park. The current Postwick Hub proposals include 20 hectares of employment land and there is potential for further growth of around 50 hectares (unmeasured estimate) on land cut off by the Norwich Northern Distributor Road.
  - Further growth at Norwich Research Park. Growth here is a fundamental part of the economic strategy for the area and there is potential for around 25 hectares of additional growth
  - More modest growth at Wymondham and Hethel
  - Employment allocations associated with major new growth locations in the Norwich Policy Area.
  - New small scale allocations in the Norwich fringe, some towns, key service centres and villages.
- 1.8 Clearly there is the potential here for significant over-allocation and further work is required on this issue.

## 2. Analysis of Norwich Policy Area growth options

### Option 1

Norwich	4000
Broadland Fringe	2000
South Norfolk Fringe	2000
North East	6000 (+4000)
South West	4000 (+3000)
Wymondham	4000 (+1000)
West	2000

Note: As much new development as possible should be located in the City of Norwich as it is a highly sustainable location. Development in the city must have regard to the mix of uses that benefit from a city centre location such as offices or shopping. Work has been carried out and is continuing to assess the capacity of the city (and especially the city centre) for new development. At present there is a high degree of confidence about these long-term estimates for housing capacity and this will be refined through regular development monitoring and viability assessment of new sites.

In Broadland the focus of development is in the north east sector. This builds on work undertaken at the Issues and Options stage of the joint core strategy and the early preparation of a core strategy for Broadland alone. Locations for growth to the north east of Norwich are supported by the evidence gathered to date.

Therefore these elements are common to all the options and the remainder of this assessment focuses on the areas where the options differ.

### **Advantages and disadvantages of Option 1**

#### **Advantages**

- The south west is currently the best performing public transport corridor with good links directly to priority measures within the city centre
- High quality public transport can be achieved with minimum impact elsewhere utilising existing bus priorities
- Wymondham has an existing rail station with services to Norwich, Cambridge and Peterborough
- Locations are close to and have good access to a choice of the established and proposed strategic employment growth locations.
- One of the submissions points to the ability to deliver a country park in the south west
- Focussing growth on the A11 corridor allows significant sharing of infrastructure costs
- Allows for continuity of growth after 2026

#### **Disadvantages**

- Growth on the A11 corridor is reliant on achieving significant improvements to the Thickthorn junction

- Long term growth at Wymondham would require expansion of the sewage treatment works by 2026, sooner if other flows are directed there
- This option does not offer direct developer funding towards the Long Stratton Bypass
- Potential impact on historic Wymondham

### **2.3 Costs of Option 1**

The early work on comparative costs is in the High Level Implementation Plan (appendix c). The cost is estimated at £606m.

### **Risks of Option 1**

#### **2.4 Significant risks across all options**

- Inability to deal with waste water – regulatory issues and overcoming constraints at Whitlingham
- Failure to secure water supply (transfers and pipes)
- Failure to deliver Norwich Area Transportation Strategy
  - Norwich Northern Distributor Road
    - Postwick junction
    - Remainder of Norwich Northern Distributor Road
  - Major public transport improvements
- Inability to provide electricity supply at Longwater - constraint to delivering employment
- Failure to deliver Longwater southern bypass junction
- Low land values and the collapse of the housing market impacts on delivery and infrastructure contributions
- Level-crossings in the North-East sector may be cause for concern

#### **2.5 Additional risks**

- Failure to provide significant improvements to the Thickthorn junction

### **Significant points from Regulation 25 consultation**

#### **2.6 North East Sector**

- Confirms eventual potential for in excess of 10,000 dwellings
- Significant interest from landowners across the area but limited evidence of co-ordination and absence of worked-up illustrative proposals challenges delivery. Further information to address these concerns has been sought.
- Rackheath eco-community proposal is more advanced and has the potential for early delivery

#### **2.7 Hethersett/Lt Melton and Colney/Cringleford fringe**

- Three separate but adjoining proposals totalling in excess of 700 hectares allows significant scope to shape a deliverable solution
- Developer-led proposals and limited ownerships reduces risks to delivery
- Areas proposed capable of delivering significantly in excess of the 4000 - 7000 dwellings considered
- Large scale green infrastructure, including up to 160 hectares of country parks proposed.

- Expanded Park & Ride with direct access from the A11 and other transport solutions proposed.

## **2.8 Wymondham**

- A range of proposals allows significant scope to shape a deliverable solution
- Developer-led proposals reduces risks to delivery
- Concerns about the potential impact on the historic environment could affect the scale of growth that might be appropriate
- Concerns about education provision and the need for new sewerage capacity are more likely to be overcome efficiently with large scale growth

## **2.9 Easton/Costessey**

- Proposals at both Easton and Costessey capable of providing around 2000 dwellings in total
- Easton proposals provides local community benefits and improvements to a key educational establishment (Easton College)

## Option 2

Norwich	4000
Broadland Fringe	2000
South Norfolk Fringe	2000
North East	6000 (+4000)
South West	4000 (+3000)
Long Stratton	2000
Wymondham	2000
West	2000

Note: As much new development as possible should be located in the City of Norwich as it is a highly sustainable location. Development in the city must have regard to the mix of uses that benefit from a city centre location such as offices or shopping. Work has been carried out and is continuing to assess the capacity of the city (and especially the city centre) for new development. At present there is a high degree of confidence about these long-term estimates for housing capacity and this will be refined through regular development monitoring and viability assessment of new sites.

In Broadland the focus of development is in the north east sector. This builds on work undertaken at the Issues and Options stage of the joint core strategy and the early preparation of a core strategy for Broadland alone. Locations for growth to the north east of Norwich are supported by the evidence gathered to date.

Therefore these elements are common to all the options and the remainder of this assessment focuses on the areas where the options differ.

### Advantages and disadvantages of Option 2

#### 2.10 Advantages

- Direct-developer funding (50%) towards the Long Stratton by-pass, reducing through traffic (and environmental impact) in Long Stratton
- Reduces the potential impact of growth on historic Wymondham
- Potential reduced impact on Wymondham sewage treatment works
- The south west is currently the best performing public transport corridor with good links directly to priority measures within the city centre.
- High quality public transport can be achieved with minimum impact elsewhere utilising existing bus priorities
- Wymondham has an existing rail station with services to Norwich, Cambridge and Peterborough
- With the exception of Long Stratton locations are close to and have good access to a choice of the established and proposed strategic employment growth locations.
- One of the submissions points to the ability to deliver a country park in the south west
- Focussing growth on the A11 corridor allows significant sharing of infrastructure costs
- Allows for continuity of growth after 2026

## 2.11 Disadvantages

- Growth on the A11 corridor is reliant on achieving significant improvements to the Thickthorn junction and access to the A11 at Wymondham. This option has 2000 fewer dwellings (compared to option 1) and more dispersed growth to fund the changes.
- Sewerage capacity is a significant constraint at Wymondham. The reduced level of growth at Wymondham is less likely to optimize investment in new sewer capacity.
- Any requirement for public funds to provide the Long Stratton By-pass means it could compete with funding with other transport schemes
- 50% developer funding of Long Stratton Bypass would limit funds available for affordable housing and/or local social infrastructure funding
- There is no existing bus transport infrastructure on the A140 corridor
- The level of growth at Wymondham will mean less use is made of the potential for rail travel compared with Option 1.
- The level of growth at Wymondham means there is no possibility of a new high school and there is no capacity at Wymondham High School
- Growth at Long Stratton will add pressure for other schemes further north on the A140

## 2.12 Costs of option 2

The early work on comparative costs is in the High Level Implementation Plan (appendix c). The cost is estimated at £622m.

## Risks of Option 2

### 2.13 Significant risks across all options

- Inability to deal with waste water – regulatory issues and overcoming constraints at Whitlingham
- Failure to secure water supply (transfers and pipes)
- Failure to deliver Norwich Area Transportation Strategy
  - Norwich Northern Distributor Road
    - Postwick junction
    - Remainder of Norwich Northern Distributor Road
  - Major public transport improvements
- Inability to provide electricity supply at Longwater - constraint to delivering employment
- Failure to deliver Longwater southern bypass junction
- Low land values and the collapse of the housing market impacts on delivery and infrastructure contributions
- Level-crossings in the North-East sector may be cause for concern

### 2.14 Additional risks

- Failure to secure the funding for the Long Stratton bypass
- Funding of Long Stratton bypass impacts on delivery of other infrastructure and affordable housing
- Failure to provide improvements to the Thickthorn junction
- Failure to provide Improvements to the A140 Harford junction (particularly Public Transport)

- Inability to provide adequate secondary education provision in Wymondham (and possibly Long Stratton)

## **Significant points from regulation 25 consultation**

### **2.15 North East Sector**

- Confirms eventual potential for in excess of 10000 dwellings
- Significant interest from landowners across the area but limited evidence of co-ordination and absence of worked-up illustrative proposals challenges delivery Further information to address these concerns has been sought
- Rackheath eco-community proposal is more advanced and has the potential for early delivery

### **2.16 Wymondham**

- A range of proposals allows significant scope to shape a deliverable solution
- Developer-led proposals reduces risks to delivery
- Concerns about the potential impact on the historic environment could affect the scale of growth that might be appropriate
- Concerns about education provision and the need for new sewerage capacity are more likely to be overcome efficiently with large scale growth

### **2.17 Long Stratton**

- Comprehensive proposals capable of providing 1500-2500 dwellings in total (delivery rates suggest that the higher level of growth would be delivered at 2000 up to 2026 with 500 thereafter)
- Includes enhanced town centre environment, services and infrastructure
- Single landowner to east of the town capable of delivering most of the growth
- Evidence provided suggests that a bypass, other necessary infrastructure and a level of affordable housing could be funded by up to 2500 dwellings. However, in the absence of alternative sources of funding all of these elements could not be funded at optimum desired levels. In particular, choices would need to be made on the standard of bypass to be provided and the levels of affordable housing. Further evidence is being sought on these issues.

### **2.18 Easton/Costessey**

- Proposals at both Easton and Costessey capable of providing around 2000 dwellings in total
- Easton proposals provides local community benefits and improvements to a key educational establishment (Easton College)

## Option 3

Norwich	4000
Broadland Fringe	3000
South Norfolk Fringe	2000
North East	6000 (+4000)
South	4500
Long Stratton	1500
Wymondham	2000
West	1000

Note: As much new development as possible should be located in the City of Norwich as it is a highly sustainable location. Development in the city must have regard to the mix of uses that benefit from a city centre location such as offices or shopping. Work has been carried out and is continuing to assess the capacity of the city (and especially the city centre) for new development. At present there is a high degree of confidence about these long-term estimates for housing capacity and this will be refined through regular development monitoring and viability assessment of new sites.

In Broadland the focus of development is in the north east sector. This builds on work undertaken at the Issues and Options stage of the joint core strategy and the early preparation of a core strategy for Broadland alone. Locations for growth to the north east of Norwich are supported by the evidence gathered to date.

Therefore these elements are common to all the options and the remainder of this assessment focuses on the areas where the options differ.

### Advantages and disadvantages of Option 3

#### 2.19 Advantages

- Some direct developer funding to deliver the Long Stratton by-pass reducing through traffic (and environmental impact) in Long Stratton
- Long Stratton and Mangreen share a transport corridor and hence the benefits of improvements at the A140/B1113 junction and Harford bridge
- Reduces the impact on the A11 corridor
- Possibility of rail station could offer marketing advantage at Mangreen
- Allows for continuity of growth after 2026
- Potential reduced impact on Wymondham sewage treatment works

#### 2.20 Disadvantages

- Requires significant investment on A140 corridor for public transport
- Introduction of public transport improvements on the A140 corridor likely to have negative environmental and traffic consequences
- Transport improvements required at Thickthorn interchange
- The level of growth at Wymondham means there is no possibility of a new high school and there is no capacity at Wymondham High School
- The reduced level of growth at Wymondham will mean less use is made of the potential for rail travel compared with option 1
- Will add pressure for other schemes further north on the A140 to relieve the effects of growth in Long Stratton



- The scale of growth at Mangreen is too small to provide a secondary school
- The development of 1000 homes in the west would be less likely to provide a critical mass for public transport and would offer a smaller contribution to the improvements needed at Longwater compared with Options 1 and 2
- Insufficient level growth for significant developer funding of Long Stratton bypass and would limit fund available for affordable housing and/or local social infrastructure provision
- Compared with Options 1 and 2 locating growth in the west becomes more difficult without Hethersett in terms of school capacity and the opportunity to pipe sewage to Whitlingham at reduced cost

### **2.21 Costs of Option 3**

The early work on comparative costs is in the High Level Implementation Plan (appendix c). The cost is estimated at £624m.

### **Risks of Option 3**

#### **2.22 Significant risks across all options**

- Inability to deal with waste water – regulatory issues and overcoming constraints at Whitlingham
- Failure to secure water supply (transfers and pipes)
- Failure to deliver NATS
  - NDR
    - Postwick junction
    - Remainder of NDR
  - Major public transport improvements
- Inability to provide electricity supply at Longwater - constraint to delivering employment
- Failure to deliver Longwater southern bypass junction
- Low land values and the collapse of the housing market impacts on delivery and infrastructure contributions
- Level-crossings in the North-East sector may be cause for concern

#### **2.23 Additional risks**

- Failure to implement significant improvements to the A140 Harford junction (particularly Public Transport)
- Inability to deliver public transport corridor in the City Centre
- Failure to implement improvements to the Thickthorn junction
- Failure to provide the Long Stratton bypass
- Funding of Long Stratton bypass impacts on delivery of other infrastructure and affordable housing
- Impacts on secondary education provision in Wymondham, Costessey (and possibly Long Stratton)
- Failure to provide access onto the A140 in the south and impacts on level-crossings in the Swainsthorpe area
- Failure to provide a secondary school at Mangreen or significant impact on Hethersett school

## Significant points from regulation 25 consultation

### 2.24 North East Sector

- Confirms eventual potential for in excess of 10,000 dwellings
- Significant interest from landowners across the area but limited evidence of co-ordination and absence of worked-up illustrative proposals challenges delivery. Further information to address these concerns has been sought.
- Rackheath eco-community proposal is more advanced and has the potential for early delivery

### 2.25 Wymondham

- A range of proposals allows significant scope to shape a deliverable solution
- Developer-led proposals reduces risks to delivery
- Concerns about the potential impact on the historic environment could affect the scale of growth that might be appropriate
- Concerns about education provision and the need for new sewerage capacity are more likely to be overcome efficiently with large scale growth

### 2.26 Mangreen / Swardston / Mulbarton

- Single proposal for new country town and Mulbarton village expansion
- Limited number of ownerships reduces risks to delivery
- At 6000 dwellings scale is larger than proposed in Option 3 but could consequently provide for new High School and assist infrastructure provision (a larger scale of development in excess of 7000 dwellings would further reduce risks to infrastructure delivery and may be possible within the land proposed)
- Green infrastructure including 40 hectare country park, further large area between Mangreen and Mulbarton may have potential for countryside activities
- Reduced scale of employment land within the proposed country town reduces potential negative impacts on current strategic employment locations but would not be available to support the community until late in the joint core strategy period.
- Proposal includes potential for new railway station
- Further evidence required, particularly on costs associated with access, the deliverability of acceptable high quality public transport infrastructure to City Centre, and on the impact on the surrounding minor road network
- Separate proposal for employment development on land to the north-east of the A140/A47 junction

### 2.27 Long Stratton

- Comprehensive proposals capable of providing 1500-2500 dwellings in total (delivery rates suggest that the higher level of growth would be delivered at 2000 up to 2026 with 500 thereafter)
- Includes enhanced town centre environment, services and infrastructure
- Single landowner to east of the town capable of delivering most of the growth
- Evidence provided suggests that a bypass, other necessary infrastructure and a level of affordable housing could be funded by up to 2500 dwellings. However, in the absence of alternative sources of funding all of these elements could not be funded at optimum desired levels. In particular, choices would need to be made on the standard of bypass to be provided and the levels of affordable housing. Further evidence is being sought on these issues

## **2.28 Easton/Costessey**

- Proposals at both Easton and Costessey capable of providing around 2000 dwellings in total
- Easton proposals provides local community benefits and improvements to a key educational establishment (Easton College)

## Summary of technical consultation on the three options

### Common Issues: General

The Environment Agency considers age and lack of capacity of sewerage network is a major constraint for early growth at Wymondham.

Natural England considers that there is no notable difference between the Options although 4000 dwellings at Wymondham may put significant pressure on the local natural environment.

The Highways Agency (HA) response predominantly seeks further evidence and clarification. The HA consider that the differences between the Options need further evaluation. At the time of writing further views of the HA are being sought.

NHS Norfolk will need to consider the implications for health services of the level of growth proposed and express no views specific to the Options.

National Grid point out that the Norwich Main Substation is at Mangreen and that this area, and Hethersett, are affected by high voltage transmission lines. They also state that the north east sector is affected by a high pressure gas transmission pipeline. These issues will have an effect on masterplanning and design of any growth proposals in the vicinity.

English Heritage is concerned about the lack of a robust evidence base for the historic environment. There are particular concerns about any significant growth at Wymondham which should not be promoted without specific analysis of the ability of the town to accommodate growth without damage to its historic character. At a subsequent meeting concerns were expressed about the potential impact of all options, including at Mangreen, Swardeston and Mulbarton, on conservation areas and listed buildings.

The Norwich Society stress the need for housing to follow economic development and be located as close to jobs as possible. The North East is opposed, in part, because of the impact of traffic in the northern part of the built-up area. They state the most efficient and environmentally friendly approach would be to concentrate growth in the south on both the A11 and A140 road/rail corridors in preference to the North East. Their preference would be for a new town of 15,000+ dwellings to the south of Norwich.

CPRE Norfolk strongly challenges the overall level of growth and its deliverability, particularly in the light of current economic circumstances. The ability of developers to fund affordable housing in addition to the NDR and Long Stratton Bypass is also challenged and the CPRE contend that growth should be located to make maximum use of existing infrastructure rather than used to support new infrastructure. Growth at Wymondham is opposed and Rackheath is considered to be poorly related to employment. More Government funding is required to deliver social housing.

NWT provides views on the type of green infrastructure that would be appropriate for each of the Options. Support for any Option is dependent on the quality of green infrastructure that can be delivered and which should also reach the eco-town target of 40% greenspace.

North Norfolk District Council welcomes transport proposals that will enhance access to Norwich, notably the NDR and improvements to the Bittern line. NNDC wish to be engaged in any cross border issues that may arise from development in the north east sector.

The Green Party on Norwich City Council raise a range of detailed concerns about each of the growth locations and conclude that the constraints and undesirability of large scale development on all these sites strengthens the case that proposed housing growth is on too large a scale.

Norwich and Norfolk Transport Action Group does not support any of the Options 1, 2 or 3 although some elements are endorsed. A key issue for selecting growth locations must be impact on CO2 emissions. Therefore accessibility to strategic employment and services and lack of reliance on road building must be principal considerations. Consequently Long Stratton, Rackheath and Mangreen are not supported. Candidates for moderate growth are North East and West (Costessey/Easton). Possible candidates for major growth are Wymondham, South West (Hethersett area) and East of Norwich without the NDR. Growth in Norwich and on smaller sites in Broadland and South Norfolk is supported.

### **Common Issues: the North East Sector**

A number of separate potential sites have been put forward across the North East sector on behalf of several different land owners. In addition three more comprehensive proposals have begun to emerge:

- Bidwells have submitted a representation on behalf of landowners to the west of Wroxham Road inside the NDR. They are concerned that the description of the area should be widened and not restricted to Sprowston and Rackheath.
- Savills have submitted a representation on behalf of some of the landowners in the sector between the Wroxham Road and Broadland Business Park, inside the NDR
- CGMS/Barratt Strategic/Building Partnerships have submitted a proposal for an eco-community at Rackheath, outside the NDR. This proposal has developed as an ecotown bid which includes a wide ranging set of potential elements including schools, a “high street”, employment, power generation, large areas of greenspace, public transport, integration of the existing community etc

The proposals inside the NDR provide very little indication of the scope of development or its deliverability. The Savills proposal includes reference to completion of an inner link road from BBP to the Wroxham Road and a possible district centre on the Salhouse Road.

Tesco considers that the planned district centre in the vicinity of their store at Sprowston is best placed to serve the majority of need in the North East Sector.

NPS welcome the identification of the NE sector of Norwich (Sprowston / Rackheath) for accommodating major growth (up to 6000 dwellings up to 2026) and 2000 dwellings on other sites in Broadland including as urban sites / urban extensions. It is considered that the County Council owned area in Sprowston, either coupled with other nearby land inside / outside the NDR as part of the 6000, or as an separate urban extension in a sustainable location (part of the 2000), represents a very strong candidate for accommodating growth early in the Strategy period, based on the opportunity to link to new growth and services, whilst also linking to existing public transport provision.

## **Conclusions: the North East Sector**

In the absence of evidence for a co-ordinated and comprehensive approach among landowners across the area, significant questions remain over the deliverability of a large sustainable new community in this area. The Rackheath element is the most advanced with a clear strategic vision and developer engagement. At the time of writing further evidence is being sought on co-ordinated delivery.

## **Common Issues: the West Sector**

Taylor Wimpey and Hopkins Homes propose a c35ha extension to the existing development at Lodge Farm, Costessey.

Easton College, Easton Parish Council, the Royal Norfolk Agricultural Association, and 3 other local landowners have submitted a proposal to include

- improvements to the College to facilitate growth in student numbers in both the 14-19 and Higher Education sectors, with expanded teaching and sports facilities, incorporating shared community use
- enhanced access
- commercial development including a local “hub” for food based industries
- a new village centre; and
- 1200 dwellings

## **Common Issues: Wymondham**

Hopkins Homes contend that the evidence base supports higher levels of growth at Wymondham than proposed in any of the Options. They are promoting over 60ha of land south of Wymondham adjacent to the B1172 (exA11) for housing led mixed use development to potentially include a 10 ha business park. The site is in a single ownership and benefits from developer engagement.

Pelham Holdings/Barton Willmore propose 2 sites to the north of Wymondham for around 500 dwellings and a larger site to the south west for 1500 homes to include a new District Centre, based around a major foodstore. They also propose 2 further significant areas to the north and south to be identified as Reserved Sites to replace failing sites prior to 2021 or for development in the period 2021-2031. The need for active monitoring and management of delivery across the JCS area is particularly stressed.

Wrenbridge (Harts Farm) Ltd are promoting a 21ha employment site adjacent to the A11 at Browick Road, Wymondham.

A number of smaller residential proposals have been put forward through the JCS and SHLAA processes. Fairfield Partnership, promoting one of these small sites, opposes Option 1 as concentrating too much growth in a single location although they also contend that Options 2/3 should re-allocate some growth from Long Stratton to Wymondham.

## **Common Issues: Smaller NPA sites**

Smaller sites, or locations for consideration, have been proposed in:

Broadland at Blofield, Brundall, Drayton, Gt&Lt Plumstead, Horsford, Rackheath, Spixworth (Crostwick), Thorpe St Andrew

South Norfolk at Hethersett and Little Melton (if not selected for major growth), Long Stratton (even without bypass), Costessey, Poringland, Spooner Row, Stoke Holy Cross, Trowse

### **Other strategic proposals**

Ifield Estates promote expansion of Broadland Business Park (as in the Broadland Gate.Postwick Hub proposals).

Trustees of the Gurloque Settlement are promoting a 90ha urban extension to the west of Thorpe Marriot (inside the NDR). It could include about 54ha of residential development parcels (i.e. c2000 dwellings at 40dph)

Goymour Properties are proposing 700-1200 dwellings on the Royal Norfolk Golf Club site at Hellesdon

Savills (on behalf of landowner) are promoting a strategic employment location at Harford Bridge adjacent to Tesco and close to the A140/A47 junction. The proposal includes a significant amount of land for landscaping, environmental and community benefits.

RG Carter/Drayton Hall Farms are promoting a 21ha employment site at Reepham Road, Drayton

Building Partnerships are promoting a development of around 93,000 m<sup>2</sup> of business floorspace on land north of the airport

Dencora 2000 are promoting a 31ha business park at Horsham St Faith adjacent to the A140/NDR junction.

### **Parish Councils**

Barnham Broom PC considers complete A11 dualling to be essential, is concerned about Broadband connections in the Longwater area and the possible need for a new telephone exchange at Costessey but would support Option 1 if selected.

Bracon Ash and Hethel PC is totally opposed to Option 3 and is concerned about the impact of Mangreen/Mulbarton on local infrastructure. Even with the infrastructure to be provided there will still be an impact on surrounding communities.

Carleton Forehoe PC proposes focussing all significant growth on a new town at Long Stratton as provision of new infrastructure to meet today's needs would be more cost effective than trying to develop existing towns and villages.

Colney Parish Meeting does not support any of the large scale developments proposed.

Cringleford PC is concerned about the impact of all 3 Options for growth on the Thickthorn and Round House junctions. With regard to fringe sites, only up to 50 dwellings is appropriate in the parish.

East Carleton and Kateringham PC is concerned about sufficient job growth but consider Option 2 to be the least objectionable. The development at Mangreen/Mulbarton is a

particular concern as it would not have a separate identity, would be urban sprawl and would have a detrimental impact on the local road network.

Easton PC want more clarity on numbers proposed for the village, accept some growth at a managed rate, and want improved cycle/pedestrian access to Longwater junction.

Hempnall PC opposes all 3 Options as being incompatible with maintaining a rural hinterland to Norwich.

Hethersett PC prefers Option 3 while Options 1 and 2 are definitely not preferred. With respect to growth proposed in Options 1 and 2, identified constraints relate to traffic, erosion of open countryside and village identity. Opportunities relate to possible 6<sup>th</sup> form provision, additional employment, leisure, affordable housing, medical centre, and cycleway to Wymondham.

Little Melton PC consider Options 1 and 2 would be disastrous for the B1108/A47/A11 and would destroy Lt Melton as a village. A new town in the area would be too close to Norwich to function independently. The A47 should be the limit for Norwich growth.

Long Stratton PC prefers Option 1 as it includes no significant growth in the village. The bypass is a must that is desperately needed as things are and needs to be in place before any growth is contemplated.

Poringland PC welcomes the approach as none of the Options contemplate major growth in their area.

Salhouse PC opposes all Options as overdevelopment, is concerned about the lack of options for people on the NE of Norwich and the potential impact of leisure activity from the proposed growth on Salhouse Broad.

Swardeston PC completely objects to Option 3 because of the Mangreen/Mulbarton proposal. Concerns include increased flooding, impact of traffic on surrounding country roads, impact of consequent traffic management on residents, lack of distinct identity, and difficulty of creating a new high street so close to city centre and existing superstore.

Tasburgh PC favour Option 1 as the A140 (even with a bypass) and local infrastructure are inadequate to support growth at Long Stratton. Wymondham is better placed to support growth because of dual carriageway, buses and trains. If there is to be growth at Long Stratton there must be a bypass and a range of improved infrastructure. The impact on other A140 junctions must be addressed.

Thurton PC considers Option 1 the most viable in terms of the evidence. Options 2 and 3 are likely to result in even more development coming to South Norfolk as it will be difficult to limit development in Wymondham. It is highly unlikely that the growth planned for Long Stratton will fund a bypass and the necessary schools and other infrastructure.

Wymondham Town Council accepts controlled growth but options for either 2,000 or 4,000 dwellings are not welcomed. All Options would require new leisure facilities in the town. Option 1 constrained by access issues to the south and east which would result in a separate community being formed. A new High School rather than expansion of existing schools would be a benefit. Options 2 and 3 – numbers of residents would be easier to assimilate, spreading growth would prevent a separate settlement being formed but would



put pressure on existing services including highways, drainage and water supplies and would lead to congestion.

### **Option 1**

Option 1 is considered to be the most deliverable by EEDA and Anglian Water.

EERA consider Option 1 to be the most consistent with regional policy due to concerns about funding of the Long Stratton Bypass.

Breckland Council raise issues around power supplies and transport capacities but see growth as a catalyst for improvements and are committed to work with the GNDP to overcome constraints. Breckland considers that Option 1 offers an opportunity to enhance the strategic road network and public transport infrastructure on the A11 and A47 corridors.

CEMEX supports Option 1 as significant growth in both Hethersett and Wymondham is supported by existing services and infrastructure and therefore is considered to best accord with PPS1 and PPS3. In relation to these locations, sites are proposed for housing at Wymondham, and recreation at Bawburgh lakes.

CGMS etc (Rackheath Eco-community) favour Option 1 as it reinforces the concept of a north-east to south-west high quality public transport corridor (both rail and bus). In addition, the sustainability of Option 3 is questioned. Reduced growth at Wymondham will limit the development of rail based solutions.

Easton College and partners support Option 1 and 2

Pegasus Planning, promoting land at Costessey on behalf of Taylor Wimpey and Hopkins Homes, consider Options 1 and 2 to be the most appropriate and sustainable strategy with a distribution of housing which reflects the spread of strategic employment locations and transportation enhancements.

Sainsbury's support 2,000 dwellings at Costessey/Easton and consider that their store can act as the focal point for a District Centre to serve the area.

Tesco could not commit to support Option 1.

The Yare Valley Society is concerned about the potential impact of new transport links from Hethersett/Lt Melton.

Children's Services consider that the greater concentration of housing in Option 1 would best support high quality educational outcomes, as the levels of housing proposed would generate the need and support new high schools at Wymondham and Hethersett. The level of growth in Costessey/Easton may pose some difficulties as there is a lack of capacity for expansion at Costessey High. Significant growth can not be accommodated in the existing school without a radical rebuild.

### **Option 1: Significant Proposals for Development**

South West Sector (Hethersett/Lt Melton including Colney/Cringleford Fringe):

### 1. Gladedale/Bidwells

- Consortium of landowners and developer
- Significant amount of background information
- Total land c350 ha around Hethersett
  - 195ha for mixed use development
  - 115ha for country park and 5 ha P&R expansion
- includes town centre, employment and high school
- Direct access to expanded P&R from A11, potential capacity improvements to Thickthorn junction.

### 2. Gable Developments/Lanpro

- Single ownership/control
- Total land c309ha both sides of A47
- 77ha for NRP and hospital expansion
- 151ha for mixed use development to include 5,500 dwellings, 3,000 space P&R to serve NRP, high school
- 45ha for country park

### 3. Barratt Strategic/John Innes Foundation/Building Partnerships/CGMS

- 50+ha at Colney Lane between N&N, A47 and new link road.
- Largely single ownership and developer on board
- Up to 2,500 dwellings

## Option 2

Considered to be the 2<sup>nd</sup> most deliverable option by Anglian Water

EERA consider that Option 2 is not consistent with regional policy by EERA due to concerns about funding of the Long Stratton Bypass.

Breckland Council raise issues around power supplies and transport capacities but see growth as a catalyst for improvements and are committed to work with the GNDP to overcome constraints. Breckland considers that Option 2 offers similar opportunities to Option 1 to enhance the strategic road network and public transport infrastructure on the A11 and A47 corridors.

Easton College and partners support Options 1 and 2

Pegasus Planning, promoting land at Costessey on behalf of Taylor Wimpey and Hopkins Homes, consider Options 1 and 2 to be the most appropriate and sustainable strategy with a distribution of housing which reflects the spread of strategic employment locations and transportation enhancements.

Homes & Property Ltd support the spreading of growth to the southern part of the NPA as represented in Option 2 and promote a site in Tasburgh.

Sainsbury's support 2,000 dwellings at Costessey/Easton and consider that their store can act as the focal point for a District Centre to serve the area.

Tesco could not commit to support Option 2.

The Yare Valley Society are concerned about the potential impact of new transport links from Hethersett/Lt Melton.

Children's Services consider that Option 2 would create significant difficulties for the delivery of high quality secondary education. 2,000 new houses in Wymondham would result in critical difficulties in the provision of additional high school places and could jeopardise what is a very successful arrangement in Wymondham. Given the constraints on the existing high school sites a higher or lower housing allocation in Wymondham would help to overcome the obstacles to increasing secondary school provision. . In addition, dispersed growth around the town could compromise the ability to deliver a new primary school. The level of growth in Costessey/Easton may pose some difficulties as there is a lack of capacity for expansion at Costessey High. Significant growth can not be accommodated in the existing school without a radical rebuild. (Discussions are ongoing regarding secondary provision in Long Stratton)

### **Option 2 : Significant Proposals for Development:**

SW Sector and Wymondham as for Option 1.

Long Stratton: Local landowner/Gaze/Pegasus Planning propose:

- A comprehensive approach to the town
- 2-2,500 dwellings
- Majority of growth can be delivered in single ownership
- Part funding of currently planned dual carriageway bypass options or full funding of single carriageway alternative
- Public transport infrastructure and service improvements
- Enhancement to the town centre and new community, commercial and social infrastructure
- Employment land
- A number of small sites have also been put forward for development in Long Stratton.

### **Option 3**

Anglian Water consider this to be the least deliverable Option

EERA considered that Option 3 is not consistent with regional policy by EERA due to concerns about funding of the Long Stratton Bypass.

Breckland Council consider that Option 3 may not provide the critical mass to significantly improve bus and rail or junction improvements on the A11 and A47. The Option also presents a potential imbalance with limited housing in a sector where there are a number of strategic employment locations.

Tesco consider that the majority of residents at Mangreen would visit the Harford store for their main food shopping and facilities at the new town would only provide for top-up shopping. It is unlikely that the scale of the Mangreen proposal could provide the necessary amount and variety of services to be quasi self sufficient and it would almost certainly cause unsustainable travel patterns. As an alternative Tesco propose an urban extension between the urban edge and the A47 with a centre anchored by the existing store.

Homes & Property Ltd support the spreading of growth to the southern part of the NPA as represented in Option 3 and consequently promote a site in Tasburgh.

Easton College consider that Option 3 risks creating a more dispersed pattern of development, putting a greater strain on infrastructure and investment, and reducing the opportunity for delivering high quality, environmentally responsible developments. The Option runs the risk of undermining the investment strategy for Easton College.

Pelham Homes/Barton Willmore are, in principle, prepared to work with South Norfolk Council to support Option 3. They propose 3 sites to accommodate 2,000 dwellings plus 2 other large areas around Wymondham as reserve sites.

Option 3's larger small site allowance in Broadland is supported by some landowners in the area.

Cllr Leslie Dale endorses the Mangreen area as having much more potential to deliver a sustainable new village than H'sett/L.Melton with the three opportunities for (1) a guided busway to the Norwich Victoria trackbed and thence the bus station), (2) the existing A140 road and (3) commuter rail station and possibly a new Norwich "parkway" station as well. Considers the expansion of Long Stratton into a fully "sustainable" community, is the last chance to gain a bypass and importantly remove a major blockage on the road to Ipswich.

Children's Services consider that Option 3 would create significant difficulties for the delivery of high quality secondary education. 2,000 new houses in Wymondham would result in critical difficulties in the provision of additional high school places and could jeopardise what is a very successful arrangement in Wymondham. Given the constraints on the existing high school sites a higher or lower housing allocation in Wymondham would help to overcome the obstacles to increasing secondary school provision. In addition, dispersed growth around the town could compromise the ability to deliver a new primary school. Similarly, the level of housing proposed in the Mangreen area would not be sufficient to generate a new high school, and the additional pupils could not be absorbed within the existing high school infrastructure. Although the scale of the impact is reduced, the lower level of growth in Costessey/Easton may still pose some difficulties as there is a lack of capacity for expansion at Costessey High. Significant growth can not be accommodated in the existing school without a radical rebuild. (Discussions are ongoing regarding secondary provision in Long Stratton)

### **Option 3 : Significant proposals for development**

Long Stratton as for Option 2

Mangreen/Mulbarton : Local landowner/Michael Falcon Property Solutions etc has put forward:

- About 292ha in total
- Development split over two areas, principal development with approx 5300 dwellings at Mangreen/Swardeston plus additional 760 dwellings at Mulbarton.
- 40 ha country park
- Proposed mineral workings will become available for 24 ha of employment development from about 2025.
- Bus/cycle route proposed with new bridge over A47 linking to relocated A140/B1113 junction. New southern link road/public transport access from A140 with new bridge over railway.

- Evidence of potential public transport infrastructure to City Centre (further work required to test deliverability).

## Housing numbers table and housing trajectory

### Housing Table Version 2 (21 Nov 2008)

Changes from version 1 : new Broadland NPA allocations increased to 9,000 (from 8,000) and new rural allocations held to requirement of 1,611

Area/District	RSS 2001-2021	Built 2001-2008	PP / Allocated	Built +Current Commitment	Allocation required to 2021	Extra 2021 to 2026	Allocation required to 2026	Total New Homes 2008 to 2026
NPA	33,000	9,673	11,851	21,524	11,476	8,800	20,276	31,680
Rural	4,500	2,084	2,005	4,089	411	1,200	1,611	4,320
<b>Total</b>	<b>37,500</b>	<b>11,757</b>	<b>13,856</b>	<b>25,613</b>	<b>11,887</b>	<b>10,000</b>	<b>21,887</b>	<b>36,000</b>
Norwich		5,484	5,911	11,395			3,000	8,911
SN (NPA)		2,850	4,156	7,006			10,000	14,156
SN (Rural)		1,256	1,343	2,599			967	2,310
Broadland (NPA)		1,339	1,784	3,123			8,000	9,784
Broadland (Rural)		828	662	1,490			644	1,306
<b>Total</b>		<b>11,757</b>	<b>13,856</b>	<b>25,613</b>	<b>11,887</b>	<b>10,000</b>	<b>22,611</b>	<b>36,467</b>
						NPA new	21,000	
						Rural new	1,611	
						Over/under RSS	724	467

3%

Rural assumptions

New allocations held to requirement and split 60/40 in accordance with 01-08 completions



## High level implementation plan

### Context

The plan is an initial attempt to draw together a costed list of infrastructure required to support each of the 3 options for growth as set out in the Regulation 25 Consultation.

The infrastructure is divided into 3 categories, critical essential and necessary. These bandings follow the definitions used in the EDAW Growth Infrastructure Need and Funding study (Dec 2007). To be clear, all the supporting infrastructure is required to deliver appropriate and sustainable growth, however growth simply cannot go ahead without certain infrastructure, such as electricity or road access. Other infrastructure such as a secondary school is vital, but before it is built the interim situation can be managed.

At this stage only strategic needs have been identified and there are gaps in the list that will need to be filled. As the gaps are consistent across all options so the costs are for comparison rather than absolute values.

The 3 options all continue to run beyond the plan period and all have different final housing numbers. To give an idea of comparison the table below identifies the cost associated with each option and a cost per dwelling (assuming the costs are spread across all dwellings)

Option	Infrastructure cost (£M)	Final Dwelling Numbers (post 2026)	Cost per dwelling (£)
1	605.6	32,000	18,900
2	621.6	31,000	20,000
3	623.8	28,000	22,200

The following tables give a detailed breakdown of the costs for each option.



## Option 1 Summary

Growth Location	Scale (final)	Item	Total Cost (£M)
Norwich	4000		
Broadland Fringe	2000		
South Norfolk Fringe	2000		
North East	6000 rising to at least 10000 beyond 2026		
South West	4000 rising to at least 7000 beyond 2026		
Wymondham	4000 rising to at least 5000 beyond 2026		
West	2000		
			605.6
<b>CRITICAL</b>			
<b>Utilities</b>			
<b>Water Supply/Waste water treatment</b>			
South West		Pipe to Whitlingham (11Km)	15
Wymondham		Expansion of existing STW	3
West		Pipeline to Whitlingham	17.5
<b>Electricity</b>			
Non Location Specific		Electricity new grid station (Norwich East)	5
Non Location Specific		Electricity new primary sub stations x1	2
Non Location Specific		Electricity new primary sub stations x2	4
Norwich		Electricity New High capacity primary sub station and primary sub station (Airport Employment)	4
Broadland Fringe		New primary substation to serve Broadland Business Park (EDAW 85)	2
South Norfolk Fringe		Earlham Grid Upgrade	0
North East		Primary Sub Station	2
South West		Grid Station (assume as South from EDAW)	5
South West		Primary Sub Station (assume as South from EDAW)	2
Wymondham		Electricity new primary substation	2
<b>Transportation</b>			
Non Location Specific/North East		NDR	100
Non Location Specific/North		Postwick Hub	20

## Option 1 Summary

East		
Non Location Specific	City Centre Bus Enhancements	13.6
Non Location Specific	City centre public realm enhancements	11
Non Location Specific	BRT corridor Yarmouth Road	10
South Norfolk Fringe	NRP transport infrastructure	7
North East	BRT corridor Salhouse Road Gurney Road	5
North East	Development Link BBP to Salhouse Road	5
North East	BRT corridor growth area(western end) via airport to A140 to City Centre	10
North East	Relocated rail station at Rackheath	25
South West/Wymondham	Thickthorn Junction improvement including bus priority	40
South West/Wymondham	Bus Priority Hethersett Lane/Hospital/NRP/UEA/City Centre	3
South West/Wymondham	BRT B1172 and A11 Newmarket Road	2
South West/Wymondham	A47/B1108 Junction improvement	0
South West/Wymondham	Expanded Thickthorn Park and Ride and A11 off slip	5
Wymondham	BRT B1172 Wymondham to Hethersett	2
Wymondham	Rail Station improvements	3
Wymondham	Widening of existing rail bridge at station	7
Wymondham	Additional crossing of rail line	5
Wymondham	Link to B1172 (south of Wymondham)	2
West	Bus rapid transit to the City Centre via Dereham Road corridor (IDP)	1.5
West	Longwater junction improvement	10
West	Pedestrian/cycle link to Longwater	1.5

## ESSENTIAL

### Community and Local Services

Non Location Specific	New or extended fire station	8
	District centre	
	Open space and play areas	
	Outdoor sports facilities	
	Community facilities	
	Library facilities	
	Police and crime prevention facilities	
	Ambulance facilities	

## Option 1 Summary

<b>Primary Education</b>		
North East	5x420 place primary school	40
Wymondham	Two 420 place and one 210 place primary schools	22
West	1x210 place primary school	6
South West	3x420 place primary school and one 210 place primary school	30
<b>Healthcare</b>		
	Primary Healthcare Facilities	
	Dentistry facilities	
Non Location Specific	Acute Beds	25
Non Location Specific	Mental Health Beds	5
<b>Transportation</b>		
	Local access improvements	
<b>NECESSARY</b>		
<b>Green Infrastructure</b>		
	GI Strategy Schemes	11.6
<b>Education</b>		
	<b>Secondary Education</b>	
South West	One High School	30
Wymondham	One High School	30
North East	Secondary schools	30
West	Secondary school contribution actual provision at Costessey/Earlham /Hethersett/ Easton College	6
	<b>Children's Centres</b>	
<b>Affordable housing</b>		
	Affordable housing	
<b>Community and Local Services</b>		
	Indoor sports facilities	
<b>Transportation</b>		
	Enhanced pedestrian facilities	

## Option 1 Summary

Enhanced cycling facilities  
Travel Plans, travel awareness campaigns and improved information

### Utilities

<b>Gas</b>		
Broadland Fringe	Gas reinforcement for Broadland Business Park and Salhouse Road employment areas	3
South West	Connection to gas main (est from EDAW)	1.8
Wymondham	Connection to gas main	5.1
<b>ICT Connections</b>		

## Option 2 Summary

Growth Location	Scale (final)	Item	Total Cost (£M)
Norwich	4000		
Broadland Fringe	2000		
South Norfolk Fringe	2000		
North East	6000 rising to at least 10000 beyond 2026		
South West	4000 rising to at least 7000 beyond 2026		
Long Stratton	2000		
Wymondham	2000		
West	2000		
			621.6
<b>CRITICAL</b>			
<b>Utilities</b>			
<b>Water Supply/Waste water treatment</b>			
South West		Pipe to Whitlingham (11Km)	15
Wymondham		Expansion of existing STW	3
West		Pipeline to Whitlingham	17.5
<b>Electricity</b>			
Non Location Specific		Electricity new grid station (Norwich East)	5
Non Location Specific		Electricity new primary sub stations x1	2
Non Location Specific		Electricity new primary sub stations x2	4
Norwich		Electricity New High capacity primary sub station and primary sub station (Airport Employment)	4
Broadland Fringe		New primary substation to serve Broadland Business Park (EDAW 85)	2
South Norfolk Fringe		Earlham Grid Upgrade	0
North East		Primary Sub Station	2
South West		Grid Station (assume as South from EDAW)	5
South West		Primary Sub Station (assume as South from EDAW)	2
Wymondham		Electricity new primary substation	2
<b>Transportation</b>			
Non Location Specific/North		NDR	100

## Option 2 Summary

East		
Non Location Specific/North East	Postwick Hub	20
Non Location Specific	City Centre Bus Enhancements	13.6
Non Location Specific	City centre public realm enhancements	11
Non Location Specific	BRT corridor Yarmouth Road	10
SNDC Fringe	NRP transport infrastructure	7
North East	BRT corridor Salhouse Road Gurney Road	5
North East	Development Link BBP to Salhouse Road	5
North East	BRT corridor growth area(western end) via airport to A140 to City Centre	10
North East	Relocated rail station at Rackheath	25
South West/Wymondham	Thickthorn Junction improvement including bus priority	40
South West/Wymondham	Bus Priority Hethersett Lane/Hospital/NRP/UEA/City Centre	3
South West/Wymondham	BRT B1172 and A11 Newmarket Road	2
South West/Wymondham	A47/B1108 Junction improvement	0
South West/Wymondham	Expanded Thickthorn Park and Ride and A11 off slip	5
Wymondham	Bus Priority B1172	2
Wymondham	Rail Station improvements	3
Wymondham	Widening of existing rail bridge at station	7
West	Bus rapid transit to the City Centre via Dereham Road corridor (IDP)	1.5
West	Longwater junction improvement	10
West	Pedestrian/cycle link to Longwater	1.5
Long Stratton	A140 Long Stratton Bypass	35
Long Stratton	Bus priority - approach to Harford Junction	2
Long Stratton	Widening rail bridge for bus priority	10
Long Stratton	BRT A140 corridor to city centre	0

## ESSENTIAL

### Community and Local Services

Non Location Specific	New or extended fire station	8
	District centre	
	Open space and play areas	
	Outdoor sports facilities	
	Community facilities	
	Library facilities	
	Police and crime prevention facilities	

## Option 2 Summary

	Ambulance facilities	
<b>Primary Education</b>		
North East	5x420 place primary school	40
Long Stratton	One 420 place primary school	8
Wymondham	One 420 place primary school	8
West	1x210 place primary school	6
South West	3x420 place primary school and one 210 place primary school	30
<b>Healthcare</b>		
	Primary Healthcare Facilities	
	Dentistry facilities	
Non Location Specific	Acute Beds	25
Non Location Specific	Mental Health Beds	5
<b>Transportation</b>		
	Local access improvements	
Long Stratton	Village centre enhancements	
<b>NECESSARY</b>		
<b>Green Infrastructure</b>		
	GI Strategy Schemes	11.6
<b>Education</b>		
	<b>Secondary Education</b>	
South West	One High School	30
Wymondham	Secondary contribution	6
North East	Secondary schools	30
West	Secondary school contribution actual provision at Costessey/Earlham /Hethersett/ Easton College	6
Long Stratton	Secondary schools	6
	<b>Children's Centres</b>	
<b>Affordable housing</b>		
	Affordable housing	
<b>Community and Local Services</b>		

## Option 2 Summary

Indoor sports facilities

### Transportation

Enhanced pedestrian facilities  
Enhanced cycling facilities  
Travel Plans, travel awareness campaigns and improved information

### Utilities

	<b>Gas</b>	
Broadland Fringe	Gas reinforcement for Broadland Business Park and Salhouse Road employment areas	3
South West	Connection to gas main (est from EDAW)	1.8
Wymondham	Connection to gas main	5.1
	<b>ICT Connections</b>	



### Option 3 Summary

Growth Location	Scale (final)	Item	Total Cost (£M)
Norwich	4000		
Broadland Fringe	3000		
South Norfolk Fringe	2000		
North East	6000 rising to at least 10000 beyond 2026		
Mangreen	4500		
Long Stratton	1500		
Wymondham	2000		
West	1000		
			623.8
<b>CRITICAL</b>			
<b>Utilities</b>			
<b>Water Supply/Waste water treatment</b>			
Mangreen		Pipe to Whitlingham (5Km)	7
Wymondham		Expansion of existing STW	3
West		Pipeline to Whitlingham	17.5
<b>Electricity</b>			
Non Location Specific		Electricity new grid station (Norwich East)	5
Non Location Specific		Electricity new primary sub stations x1	2
Non Location Specific		Electricity new primary sub stations x2	4
Norwich		Electricity New High capacity primary sub station and primary sub station (Airport Employment)	4
Broadland Fringe		New primary substation to serve Broadland Business Park (EDAW 85)	2
South Norfolk Fringe		Earlham Grid Upgrade	0
North East		Primary Sub Station	2
Mangreen		Grid Station	5
Mangreen		Primary Sub Station	2
Wymondham		Electricity new primary substation	2
<b>Transportation</b>			
Non Location Specific/North		NDR	100

### Option 3 Summary

East		
Non Location Specific/North East	Postwick Hub	20
Non Location Specific	City Centre Bus Enhancements	13.6
Non Location Specific	City centre public realm enhancements	11
Non Location Specific	BRT corridor Yarmouth Road	10
South Norfolk Fringe	NRP transport infrastructure	7
North East	BRT corridor Salhouse Road Gurney Road	5
North East	Development Link BBP to Salhouse Road	5
North East	BRT corridor growth area(western end) via airport to A140 to City Centre	10
North East	Relocated rail station at Rackheath	25
Wymondham	Thickthorn Junction improvement including bus priority	2
Wymondham	Bus Priority Hethersett Lane/Hospital/NRP/UEA/City Centre	3
Wymondham	Expanded Thickthorn Park and Ride and A11 off slip	5
Wymondham	Bus Priority B1172	2
Wymondham	Rail Station improvements	3
Wymondham	Widening of existing rail bridge at station	7
West	Bus rapid transit to the City Centre via Dereham Road corridor (IDP)	1.5
West	Longwater junction improvement	5
West	Pedestrian/cycle link to Longwater	1.5
Long Stratton	A140 Long Stratton Bypass	35
Long Stratton/Mangreen	Harford Junction improvements	40
Long Stratton/Mangreen	Access works and bus priority-approach to Harford Junction	10
Long Stratton/Mangreen	Widening rail bridge for bus priority	10
Long Stratton/Mangreen	BRT A140 corridor to city centre	10
Mangreen	Traffic Management to protect minor road network between A140 and A11	10

### ESSENTIAL

#### Community and Local Services

Non Location Specific	New or extended fire station	8
	District centre	
	Open space and play areas	
	Outdoor sports facilities	
	Community facilities	
	Library facilities	
	Police and crime prevention facilities	

### Option 3 Summary

#### Ambulance facilities

#### Primary Education

North East	5x420 place primary school	40
Long Stratton	1x315 place primary school	6
Wymondham	Primary education 1x420 place primary school	8
West	Primary education 1x420 place primary school	8
Mangreen	2x420 and 1x315 place primary school	22

#### Healthcare

	Primary Healthcare Facilities	
	Dentistry facilities	
Non Location Specific	Acute Beds	25
Non Location Specific	Mental Health Beds	5

#### Transportation

	Local access improvements	
Long Stratton	Village centre enhancements	

### NECESSARY

#### Green Infrastructure

Non Location Specific	GI Strategy Schemes	11.6
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#### Education

	<b>Secondary Education</b>	
North East	Secondary schools	30
Wymondham	Secondary schools	6
	Secondary school contribution actual provision at Costessey/Earlham /Hethersett/	
West	Easton College	3
Long Stratton	Secondary schools	6
Mangreen	Secondary schools	30
	<b>Children's Centres</b>	

#### Affordable housing

Affordable housing

### Option 3 Summary

#### Community and Local Services

Indoor sports facilities

#### Transportation

Travel Plans, travel awareness campaigns and improved information

#### Utilities

	<b>Gas</b>	
Broadland Fringe	Gas reinforcement for Broadland Business Park and Salhouse Road employment areas	3
Wymondham	Connection to gas main	5.1
	<b>ICT Connections</b>	

## Summary of the Sustainability Appraisal

- 1 This document was originally prepared to accompany the preferred option of the joint core strategy under the pre-June 2008 planning-making procedures. The SA has been updated to incorporate the three growth options for the Norwich Policy Area, that were included in the July 2008 regulation 25 joint core strategy technical consultation under the new procedures.
- 2 This sustainability appraisal does not reflect the regulation 25 technical responses or the submitted evidence at this stage.
- 3 This appraisal will be developed to take account of, and inform a single favoured option for the joint core strategy. It will be developed for further public consultation under regulation 25.
- 4 This SA will be refined and finalised when the joint core strategy is published under regulation 27, before submitting it to the Secretary of State.

### Document changes:

#### Draft b

Growth Locations updated

Assessment reviewed against Scott Wilson report of 7 May 2008 (text added in pink)

Includes Alternative Growth Options

#### Draft c

Assessment reviewed against Scott Wilson audit of October 2008 (text added in green)

**Overall Conclusions: What are the main effects of the policy option as identified through the sustainability appraisal process?**

**POLICY OPTION: Locations for Growth and Change in the NPA (Growth option 1)**

### **Technical Consultation Option 1**

( Note: This option is generally looking for medium and long term growth, thus there are very limited effects in the short term, hence the 'N' scores given throughout.).

<p><b>Environmental Impacts</b></p>	<p>This option maximises opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is an advantage in relation to option 2, and significantly more than option 3. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A focus for some of the major growth on the A11 corridor in this option could have potential significant impacts on European sites if the effects are not fully mitigated but the overall strategy also provides for significant enhancement to habitats a green infrastructure. Some improvement to the policy wording needs to be more explicit, ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</p>
<p><b>Social Impacts</b></p>	<p>Social aspects score very positively, although the main focus will be on new residents in the areas indicated. Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in designing the new communities in a 'masterplanning' exercise to ensure effective delivery.</p>
<p><b>Economic Impacts</b></p>	<p>The policy scores very positively. It performs a little better than option 2, and better than option 3 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.</p>
<p><b>Overall summary:</b></p> <ul style="list-style-type: none"> <li>• Impacts</li> <li>• Possible mitigation measures</li> <li>• Recommended further research</li> <li>• Considering cumulative impacts</li> </ul>	<p>Policy generally performs very well against sustainability criteria. Some improvement to policy wording required to make the implicit explicit.</p> <p>Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy.</p> <p>Need to investigate:</p> <ul style="list-style-type: none"> <li>• strengthening consideration of landscape impacts</li> <li>• and potential for innovative use of the railway.</li> </ul>

**Overall Conclusions: What are the main effects of the policy option as identified through the sustainability appraisal process?**

**POLICY OPTION:                   Locations for Growth and Change in the NPA (Growth Option 2)  
Technical Consultation Option 2**

<p><b>Environmental Impacts</b></p>	<p>This option redistributes some growth in south Norfolk and makes less use of the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is a disadvantage in relation to option 1 but better than option 3. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A reduced focus for some of the major growth on the A11 corridor in this option could have marginally less potential for significant impacts on European sites if the effects are not fully mitigated. This strategy overall also provides for significant enhancement to habitats a green infrastructure. Some improvement to the policy wording needs to be more explicit, <b>ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</b></p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive.</p> <p>The scale of growth in Long Stratton is a small proportion of the overall requirement across the plan area and while locally significant particularly on the regionally important A140 corridor, in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements from a bypass.</p>
<p><b>Social Impacts</b></p>	<p><b>Social aspects score very positively, although the main focus will be on new residents in the areas indicated.</b> Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in <b>designing the new communities in a 'masterplanning' exercise to ensure effective delivery.</b></p> <p>Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p>
<p><b>Economic Impacts</b></p>	<p><b>The policy scores very positively but not as well as Option 1 and better than option 3 in promoting growth that is well-located in relation to,</b> and supports key strategic employment locations and associated sectors.</p> <p>The long Stratton Bypass will improve strategic access along the A140 and may give a local boost to Long Stratton.</p>

<p><b>Overall summary:</b></p> <ul style="list-style-type: none"><li>• <b>Impacts</b></li><li>• <b>Possible mitigation measures</b></li><li>• <b>Recommended further research</b></li><li>• <b>Considering cumulative impacts</b></li></ul>	<p>Policy generally performs well. Growth in long Stratton not ideally located for strategic employment sites and is over 10 miles from Norwich city centre. The need to fund a bypass may divert investment from other areas and infrastructure needs although it will improve strategic access. Education solutions for high schools in Long Stratton and Wymondham are compromised. Uncertainty over the funding of a Long Stratton bypass could have consequent impacts on provision of and access to other social infrastructure also negatively impact in this way.</p> <p>Implementation of sustainable transport infrastructure and services will be key, <b>as this is one of the main requirements for growth set out in the regional spatial strategy.</b></p> <p>Need to investigate:</p> <ul style="list-style-type: none"><li>• <b>strengthening consideration of</b> landscape impacts</li><li>• and potential for innovative use of the railway.</li></ul>
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**Overall Conclusions: What are the main effects of the policy option as identified through the sustainability appraisal process?**

**POLICY OPTION:**

## **Locations for Growth and Change in the NPA (Option 6a) Technical Consultation Option 3**

<p><b>Environmental Impacts</b></p>	<p>Overall beneficial, but may not easily achieve the high quality public transport system necessary to limit CO<sub>2</sub> emissions and manage travel demand from the planned scale of growth.</p> <p>This option would redistribute growth in South Norfolk more than option 2 and, apart from growth at Wymondham, would not use of the opportunities for sustainable travel on the A11 corridor which has established good quality bus infrastructure closer on the approaches Norwich. This is a disadvantage in relation to options 1 and 2. Growth to the north east would benefit from choice and flexibility about how to manage bus and car traffic. A much reduced focus for some of the major growth on the A11 corridor in this option may avoid potential for significant impacts on European sites. This strategy overall also provides for significant enhancement to habitats and green infrastructure. Some improvement to the policy wording needs to be more explicit, <b>ensuring these positive aspects are recognised. The combined locations included as part of the policy give very positive scores, although the primary use of greenfield land is a disadvantage in absolute terms for all options, as is the potential impact on local landscapes where large scale growth is being promoted. Potential bus rapid transit indicated is a benefit to large parts of the existing area.</b></p> <p>The growth in Long Stratton has the potential to be less sustainable because of the potential to increase travel distances to other centres and to Norwich where most people work. The distance from Norwich for buses along an unimproved A140 corridor give less opportunity than option 1 to mitigate car journeys and make bus use more attractive.</p> <p>The scale of growth in Long Stratton is a small proportion of the overall requirement across the plan area and while locally significant particularly on the regionally important A140 corridor, in itself this does not significantly affect the sustainability of this option. In Long Stratton there will be local environmental improvements <b>from a bypass.</b></p>
<p><b>Social Impacts</b></p>	<p>Overall beneficial, but some development not accessible to larger centres and services. Dispersed transport and education infrastructure costly and will impact on the ability to provide other essential infrastructure and affordable housing.</p> <p><b>Social aspects score very positively, although the main focus will be on new residents in the areas indicated.</b> Will ensure new residents have good access to jobs and services. The policy maximises ability to provide affordable housing and new services and infrastructure. Requires community engagement in <b>designing the new communities in a 'masterplanning' exercise to ensure effective delivery.</b></p> <p>Investment required for the Long Stratton Bypass will draw funding away from other infrastructure needs and affordable housing.</p>

<b>Economic Impacts</b>	<p>Uncertainty over the timing and impact of promoting a further strategic employment site.</p> <p>The policy scores very positively. It performs a little worse than option 1 and option 2 in promoting growth that is well-located in relation to, and supports key strategic employment locations and associated sectors.</p> <p>The long Stratton Bypass will improve strategic access along the A140 and my give a local boost to Long Stratton.</p>
<p><b>Overall summary:</b></p> <ul style="list-style-type: none"> <li>• Impacts</li> <li>• Possible mitigation measures</li> <li>• Recommended further research</li> <li>• Considering cumulative impacts</li> </ul>	<p>Generally positive impacts. Score held down by the ability to provide high quality public transport, the costs of infrastructure and the consequent impacts on provision of and access to other social infrastructure. Uncertainty over the funding of a Long Stratton bypass could also negatively impact in this way.</p> <p>Implementation of sustainable transport infrastructure and services will be key, as this is one of the main requirements for growth set out in the regional spatial strategy.</p> <p>Need to investigate:</p> <ul style="list-style-type: none"> <li>• strengthening consideration of landscape impacts</li> <li>• and potential for innovative use of the railway.</li> </ul>

## Contingencies

This appendix outlines the proposed response if assumptions made about the availability of new infrastructure prove unfounded. This summary shows only the suggested response. A full document setting out the alternative responses for each scenario is available for Members inspection.

For the purposes of this assessment, the focus is entirely on those investments which are dependent on decisions made by external bodies, for example the Highways Agency, utility regulators or the Department for Transport in approving Norfolk's Local Transport Plan, in relation to the Norwich northern distributor road (which will be dependent, at least in part, on funding through the Local Transport Plan). Schemes such as the Long Stratton bypass which are assumed to be fully funded by the associated development have not been included in this assessment. Similarly other infrastructure, such as schools, health care facilities, social facilities, green infrastructure etc. which are assumed to be integral to the development in question have not been included.

Because of the complexity of the plan's strategy, it is not feasible to simply outline a fall back strategy or "plan B." Instead, this section of the plan sets out a range of scenarios each of which relates to the failure to achieve a key item of infrastructure, and a proposed response. For each possible response the pros and cons are set out.

### Norwich Policy Area

**Scenario A:** Effluent quality improvements to Whitlingham sewage treatment works unachievable.

#### Contingency

Permit development on a smaller sites and in addition, permit those major growth locations served by separate sewage treatment works or where new sewage treatment works are proposed

#### Pros

- Would achieve a higher proportion of allocations, including affordable housing would minimise housing stress while avoiding unacceptable environmental damage
- Would an maximise potential for economic growth while avoiding unacceptable environmental damage
- Would permit an early start on those major sites where alternative sewage treatment facilities can be achieved

#### Cons

- Would fail to achieve complete development strategy

**Scenario B:** Failure to augment water supply to the area, combined with unwillingness of the Environment Agency to permit additional abstraction

#### Contingency

Permit development on smaller allocations (within the urban area, urban fringe and villages, but not the major strategic growth locations) up to the limit of Anglian Water's ability to supply within the terms of their current consents

#### Pros

- Would deliver some housing including affordable housing

- Would limit housing stress
- Would contain environmental risk to the level already accepted by the environment agency when granting current consents

#### **Cons**

- Would only partially achieve housing delivery
- Would result in some housing stress
- Would result in some limitation on economic growth

**Scenario C:** Norwich northern distributor road not constructed, but Postwick junction improved

#### **Contingency**

Allow partial development in the northeast (within the line of the proposed link road connecting the Broadland Business Park to Sprowston park and ride site) and on the sites within the urban area including the fringe.

#### **Pros**

- Could deliver some housing in the north east, and urban area
- Could extend the link road to North Walsham Road to improve access to Wroxham Road park and ride site
- Would achieve for delivery of Broadland Business Park and some employment growth

#### **Cons**

- Although access to Wroxham Road park and ride site would be improved and some public transport priorities who may be possible, it would not be possible to deliver a step change in public transport and a significant modal shift
- Would add pressure to some facilities which cannot easily be extended e.g. Sprowston High School
- The airport employment allocation cannot be delivered, limiting economic benefit

**Scenario D:** Postwick junction not improved

#### **Contingency**

Permit no development in the northeast (including the Airport employment allocation and Broadland Business Park) except for small sites within the urban area and urban fringe, and make a compensating allocation (the location would depend on the chosen option for growth in the Norwich policy area)

#### **Pros**

- Reduces of the economic impact compared with possible response 2 above as economic growth related to housing development will still occur
- Avoids danger/congestion at Postwick junction

#### **Cons**

- Severe curtailment of economic potential through the loss of two strategic employment allocations
- Likely to impose further pressure on another southern bypass junction unless improvements to the junction in question are already planned in connection with other plan proposals.
- Proximity to any other existing proposal would be likely to inhibit rates of development through saturation of the local market either for housing or employment

## **Scenario E:** Harford junction not improved

### **Contingency**

Implement option in part (Long Stratton proceeds; Mangreen does not proceed)

#### **Pros**

- Achieves local benefits at Long Stratton
- Achieves some housing and employment growth at Long Stratton
- limits impact on Harford junction

#### **Cons**

- Fails to deliver full quantum of housing
- Increases housing stress as a consequence
- Fails to deliver public transport improvements on corridor downstream of Mangreen, so existing residents do not benefit

## **Scenario F:** Thickthorn junction not improved

### **Contingency**

No development in the A11 corridor, outside the southern bypass, but compensating allocation at Mangreen (applies to options 1 and 2 for the distribution of growth in the Norwich policy area)

#### **Pros**

- There would be improvement in the public transport corridor for Harford park and ride as a result of the compensating allocation at Mangreen
- Any loss of housing delivery would be limited to that resulting from delay arising from the need to initiate development at the compensating allocation at Mangreen
- Economic development directly related to the provision of housing would be achieved

#### **Cons**

- Heavy investment would be required in the A140 corridor (for example improvements to bridges on the A140 within the urban area, public transport priorities potentially involving a new bridge across the southern bypass, and improvement to the Harford southern bypass junction). Therefore this option would essentially be substituting investment on one corridor for investment on another.
- Fails to offer any enhancements to Thickthorn park and ride
- Fails to deliver employment allocations at Wymondham and Hethel
- Housing delivery might be delayed by the need to start a major development from scratch on the compensatory allocation
- Possible response 6

## **Scenario G:** Improvements to B.1108 the junction with southern bypass not implemented

### **Contingency**

Proceed with implementation of Norwich research park allocation

#### **Pros**

- retains the NRP, an employment allocation which is critical to the entire strategy and which cannot be replaced because of site specific synergies
- retains the benefit of the NRP to the sub-regional economy
- retains the synergies with Norfolk and Norwich university hospital and the UEA

## **Cons**

- results in increased pressure on the B.1108/ southern bypass junction
- will add pressure to other roads in the area as a traffic reassigns itself to avoid the B.1108/ southern bypass junction

## **Scenario H: Longwater junction not improved**

### **Contingency**

No development of employment allocation at Longwater: permit development of Queens Hills to extent of the current permission, permit development of smaller sites at Costessey inside the southern bypass, permit development at Easton, but and served by improved A 47 and junction at western end of Easton, combined with restraint on access to Longwater junction from Easton

### **Pros**

- Minimise non of delivery of housing allocations
- Minimise housing stress and pressure elsewhere in the plan area
- Minimise and loss of economic benefit arising directly from housing development

### **Cons**

- Relies on a short length of trunk road for local journeys
- Failure to deliver Longwater employment allocation
- Lose some of the benefits to Easton College of nearby development

## **Scenario I: Failure to resolve electricity constraints at Costessey**

### **Contingency**

No development of employment allocation at Longwater: but permit residential development in the area in accordance with the strategy

### **Pros**

- delivery of housing allocations
- avoid housing stress and pressure elsewhere in the plan area
- avoid loss of economic benefit arising directly from housing development

### **Cons**

- Failure to deliver Longwater employment allocation

## **Scenario J: Constraints prevent delivery of multiple strategic employment allocations**

### **Contingency**

Permit development of strategic employment area at another location. In order to provide choice, the selected location should not replicate any of the corridors served by the remaining allocations being successfully implemented and cannot be located in an area affected by the constraint preventing implementation of the allocations which cannot be delivered. A location in the northwest would be unacceptable because of the potential to create cross valley traffic affecting an internationally designated area and the settlements of Taverham and Costessey. It is therefore proposed that the reserve strategic employment allocation should be located near the Tesco Harford store.

### **Pros**

- Minimise economic detriment resulting from failure to deliver allocated sites
- Maintain choice of locations
- Harford is well related to A 47
- Location will benefit from public transport priorities associated with the Mangreen development (if option 3 is selected)

- Can help contribute to public transport priorities to serve the Mangreen development (if option 3 is selected)

#### **Cons**

- Harford does not relate as well to the strategic road network as sites allocated
- If Airport site were among those which could not be delivered, Harford would not meet the socioeconomic objective of increasing employment opportunities in the northern part of the urban area
- Would not be able to adequately substitute for areas of more specialised interest such as a Norwich Research Park or provide for airport related development

## **Rural Areas**

In these areas, the scale of allocation in any particular area is much smaller than in the strategic allocations within the Norwich policy area, but tends to reflect a more localized need. Therefore, if it should prove impossible to bring forward any allocation as a consequence of a decision by an external body as described in the introduction to this section, any resultant shortfall in the provision is better met in the immediate locality.

Therefore as a general principle, if it should prove impossible to bring forward an allocation, and as a consequence overall provision would fall below the level required to meet the East of England Plan's requirements, the deficit will be met within the same district, and within the next tier down in the settlement hierarchy. This should help to ensure that the plan's overall strategy in terms of geographical distribution is not compromised.

## Summary of technical responses - Key issues raised on matters other than Norwich policy area growth options

### Question 1 Have we identified the right critical infrastructure requirements?

Many respondents considered the correct infrastructure needs had been identified though a number of other points were made including:

- References to the cost of infrastructure being prohibitive, and public investment in infrastructure necessary to bring about the strategy
- Green links should be included
- Councillor Dale argues for the dualling of the A11 to be regarded as critical in view of its importance to links to London and the Midlands
- Affordable housing should be included
- Concerns about the emphasis on public transport/walking/cycling in Norwich and a failure to acknowledge the need of the car for access from surrounding areas
- Excessive emphasis on roads and failure to consider the potential of demand management. Until this is considered it is premature to consider road schemes essential, taking into account climate change / fuel costs and consequent changing patterns of movement
- Not sufficient evidence on why road schemes in paragraph 6.2 are critical but need for public transport and junction improvements on the A 11 as well as the A47 (especially Thickthorn) to access jobs at Hethel, Wymondham, Colney, Cringleford and Longwater
- Energy is also critical in the south west sector
- Norfolk County Council Children's Services state need to expand and improve schools is appropriately reflected, but an additional reference should also be made to the need to increase post 16, special needs, child care and Children's Centre provision.
- Needs expanding into a full delivery plan which will highlight implications for timing of specific developments. Some of these are entirely dependent on very major infrastructure
- Distinction between "critical" and "essential" infrastructure is spurious and the list should simply be prioritised
- Long Stratton bypass should be included in "critical" category
- Community safety means police investment should also be seen as critical (though respondent notes this is acknowledged in the tables in the implementation chapter)
- Completion of A11 dualling critical in view of its importance to links to London and the Midlands
- Southern bypass junctions should not be improved as the problems only arise at peak times
- NDR. not critical to Rackheath eco town, but acknowledged as highly beneficial in terms of creating public transport links to Norwich
- NDR connection to A47 (west)
- Concerns over funding of NDR and impact on delivery if the developer funding sought
- Some of the development could go ahead in advance of the identified infrastructure



- Question whether the hospital can cope with projected levels of growth

A number of other points were made generally relating to particular localities rather than the strategy overall.

### **Officer Response**

It is gratifying that many respondents were in broad agreement. While the differences of emphasis above are noted and acknowledged, it still seems a reasonable to draw a distinction between the infrastructure expected to be provided as part of a development and that which is dependent on a decision by an external body (such as the highways agency, a utility regulator etc). In this context it is an accepted that the resolution of power problems in the south west sector, and junction improvements on trunk roads should be viewed as critical. This is significant because one area where the plan needs to be strengthened is in articulating a response to the possibility of such infrastructure not being provided as expected. A later section of this report suggests an addendum to the plan which might be added as an appendix setting out the contingency response in this eventuality. It is still considered appropriate that the focus is on infrastructure within or adjacent to the plan area in terms of accommodating the required levels of development.

### **Question 2 City Centre – are you aware of any major issues that would prevent delivery of this proposed policy?**

There was a broad measure of agreement for the aims of the policy. Particular issues raised include

- Minimal sewer capacity in the city centre
- Necessity for high quality public transport access to the city centre from new growth areas in the Norwich policy area, as well as other locations including improved evening services to facilitate public transport as a choice for commuting. Park and ride services should also operate in the evening
- Councillor Dale questions the role of the city as a modal interchange in view of existing congestion in the centre.
- Support for city centre as a retail focus, including comparison goods
- Support, but not all comparison goods shopping should be in the city centre
- Note the need for additional convenience shopping. Existing stores well placed to accommodate this.
- The city centre policy fails to take account of competing land uses. Residential development in the city centre will only succeed if the impacts of the commercial development are contained.
- More emphasis needed on protection of the historic environment and potential for green infrastructure. Concern that improved green links and public realm could be compromised by the emphasis given to transport. Some SSSI s / local nature reserves/ county wildlife sites in Norwich( but not necessarily in city centre) highlighted
- Outcome of the water cycle study and level 2 SFRA needed to guide development and need for investment in city centre – potential of some areas may be limited
- There should be a major policy focus also “to make Norwich a safe place to develop retail, leisure, office and culture activity”, as the city centre safer neighbourhood team has the highest level of crime of the 52 neighbourhoods in Norfolk

- Excessive traffic restraint will drive employers out and threaten the strategy unless an alternative in the form of a high quality public transport at reasonable prices can be produced – the present situation is the worst of both worlds
- Achievement of the strategy will require resolution – there have been examples where local opposition has thwarted the ambitions e.g. St Andrews Hall
- Comments about the excess of flatted developments in recent years and concerns about the market being able to deliver the strategy
- Concern that any reduction in density, coupled with the need to achieve expected levels of growth will endanger the green areas in the city
- There is a need for a focus on planning the evening economy

### **Officer Response**

Few of the comments challenge the direction of the draft strategy, which seeks to recognise the city centre's role as the focus for commercial activity in the area. It is agreed that there are some competing uses, principally retail and large-scale employment and work needs to be done to confirm the capacity of the city centre to accommodate these competing uses. It is also acknowledged that parts of the city centre are within flood probability zone 2 and more detailed work will be needed at the site specific allocations stage to ensure that these areas remain appropriately protected. Similarly the limited sewer capacity is recognised, though this should not be a constraint on redevelopment, but is a consideration in the selection of major areas for growth, to avoid exacerbating this issue.

The policy recognises the need to protect and improve open spaces and green linkages. Similarly the policy specifically refers to the need to “enhance the historic city, including its built and environmental assets...”

Many of the comments allude to traffic issues. It is fully accepted that traffic is an issue, and that one of the critical planks of the plan's overall strategy should be to bring about a significant modal shift towards public transport. This, however will be dependent not only on measures in the city centre which are relatively advanced, but also in the way major growth is shaped, and in the way investment in public transport can be used to improve the service offered to residents in the existing built up area.

The comments of the police are accepted, and in view of the nature and role of the city centre, some specific policy emphasis on community safety/crime prevention would be appropriate. This could be combined in the policy with the requirement expressed by the City Centre Management Partnership for a policy focus on planning the evening economy.

**Question 18 Main Towns -- what additional infrastructure requirements would there be?**

The Main Towns identified in the document published in July were Aylsham, Harleston, and Diss. In addition, Wymondham was identified as a potential Main Town, should it not be selected to accommodate strategic levels of growth within the Norwich policy area.

As well as comments on infrastructure, many people took the opportunity to comment on the suitability of the settlements in question to be treated as Main Towns. In this respect, there was a high level of support in principle for their selection. Principal points made were

### **Aylsham**

- Anglian Water commented that it is wrong to say Aylsham cannot accommodate more development. This may be possible subject to the agreement of the Environment Agency to vary current consents and to the necessary investment being agreed. In other correspondence Anglian Water have suggested this is likely to be after 2016.
- Agents on behalf of clients make a similar point that Aylsham has the attributes of a Main Town and believe that the sewage treatment works problem can be resolved after 2016. They suggest an allocation of 300 dwellings taking into account the capacity at schools. They acknowledge policies in the East of England Plan stating that allocations should avoid the need for new infrastructure where possible but believe that this and the conclusions of the water cycle study (stage 2 A) and should not be viewed as the overriding determinants in considering allocations. They acknowledge it is hard to quantify costs surrounding sewage treatment but contend they are not prohibitive.
- Other agents make similar points regarding the principle of an allocation at Aylsham but suggest an allocation of 600 to 1000 dwellings

### **Diss**

- One of the medical practices comments that there is a need for additional health resource at primary care level, with particular reference to pregnancy and drugs.
- NHS Norfolk acknowledge there will be some impact on primary and community services but comment that there is new capacity at Wymondham and they are considering new facilities at Diss, but, at these levels of growth investment beyond that already contemplated is unlikely to be needed.
- Agents on behalf of clients support the retail hierarchy and in particular the identification of Diss as a town and large district centre. They contend that expansion of the centre should include land under their client's control.
- Diss Town Council comment that 300 dwellings would represent a 10% growth in the town and that the high school is already over capacity and will need investment they also suggest investment will be needed in terms of transport (Vince's Road, and bus/rail integration at the station). The Town Council also suggest investment is needed in leisure facilities and primary care facilities (particularly dentistry) which has been held up by funding issues
- Another agent suggests that Diss is highly accessible and sustainable with good rail links. In this respect, he draws a distinction with Harleston, and while not criticising of the identification of Harleston as a main town, suggests that a more refined approach should be taken with Diss being expected to accommodate significantly more development than Harleston because of its wider range of facilities and better sustainability credentials.
- Norfolk County Council Children's Services say additional primary and secondary places would be required. There is scope to expand the high school but it would be more complex at primary level given existing site constraints. 300 new houses would be well below the threshold to provide a new primary school and extending the

existing schools in situ may not be possible. It is unlikely that the level of section 106 funding would be sufficient to overcome the practical issues are expanding the existing infant and junior schools.

- A number of specific traffic management measures are identified by a further agent
- A major retailer suggests that a further 300 homes in Diss will require increased convenience goods floorspace and suggests expansion of an existing town centre food store

### **Harleston**

- The Town Council comment that there is already pressure on leisure facilities, quoting specific examples, dentist and doctors facilities, traffic concerns and localised flooding arising from sewer capacities in the town.
- An agent on behalf of clients who supports the selection of Harleston as a market town is in broad agreement with the scale of the allocation at 300 dwellings but suggests this should be viewed as a minimum, not a ceiling.
- Norfolk County Council Children's Services say there are currently spare secondary places in Harleston, however as in Diss, further expansion of the primary school on the existing sites would prove complex. In this instance the primary and secondary schools are both voluntary aided and therefore would need to link into the funding streams of the Diocese.

### **Wymondham**

- Agents suggest mixed use development in east Wymondham as the employment sites at Gateway 11 and Ayton Road are virtually full, to reduce the imbalance likely to arise from housing development
- Other agents support Wymondham as a Main Town, and of the Diocese of Norwich also expresses its support for Wymondham as a Main Town and location for growth
- The Town Council refer to the central bus hub/coach park and the need to connect bus transport facilities better to the railway station
- The Environment Agency and a developer refer to the limitations of the old sewer network of uncertain capacity commenting on flooding and drainage issues, and suggesting that the need for investment may constrain development coming forward early (though this comment is made mainly in relation to potentially higher levels of growth should Wymondham be selected as a major location for development)
- One agent, promoting a site at Great and Little Plumstead opposes development at Wymondham arguing that and development here would promote longer commuting journeys. He makes the same point about Long Stratton.

### **General points**

- The police comment that all the Main Towns identified enjoy good police station facilities, though there may be a need for additional front line policing .( Higher levels of growth at Wymondham, if selected for major growth, would require additional resources)
- Saffron Housing Trust, an agent and Norfolk Wildlife Trust emphasize the need for green infrastructure to be an integral part of any development within Main Towns providing links between the towns and surrounding countryside. The wildlife trust is currently engaged in the south west in a South Norfolk clay lands "living landscape" project. Saffron Housing also refer to the need for renewable energy to be an integral part of any development in market towns
- Little Melton Parish Council question why there is no reference to Attleborough .

### **Officer Response**

Generally there is no dissent about the selection of the Main Towns. The key areas identified are the significance of the sewage treatment works constraint at Aylsham, the question of whether there should be differentiation in the scale of the allocation made and the significance of any identified level of allocation i.e. is it a ceiling or a minimum?

A number of agents have questioned the sewage treatment constraint at Aylsham and indeed Anglian Water have suggested in conversations with officers that the conclusions of the water cycle study stage 2 A should not be viewed as a definitive constraint. In the light of these discussions, Aylsham will be considered further in the next stage of the water cycle study to try to understand the constraints better. Later in this report there is a suggested addendum to the plan covering contingencies, and the section of that addendum relating to the rural area seeks to address this in such a way that, should Aylsham be identified for an allocation, and difficulties in delivering it arise, there is an appropriate response. For the moment it is suggested that the question of an allocation be kept open pending the outcome of the water cycle study stage 2B. However, the total allocation needed in the rural area suggests that the larger figures suggested by some agents are unlikely to be required whatever the sewage treatment situation.

There seems to be some merit in considering refining the scale of the allocation needed in the different Main Towns taking into account their relative capacity thresholds and accessibility. This will need further dialogue with Children's Services.

The significance of the number of dwellings allocated has been raised not only in this context, but also in relation to the Key Service Centres, Service Villages and Other Villages. It is accepted that the East of England Plan sets an overall provision which should be viewed as a minimum rather than a maximum, but in order to achieve some overall coherence to the plan's strategy, it would be unrealistic to view the scale of allocation needed in each settlement identified as a minimum without resulting in a "free for all". In relation to other levels in the hierarchy some agents have suggested that the indicative number for different levels in the hierarchy should be viewed as an indication but with the scope to exceed it subject to particular circumstances, such as "where it can be demonstrated that it would contribute to meeting the needs and requirements of the (village) and its surroundings and where sufficient capacity exists or can be provided to serve the growth and where it would not unduly impact upon existing environmental assets". It is suggested that subject to policies including a caveat along these lines some flexibility in the scale of growth could be built into the plan at different levels in the hierarchy. The acknowledgement of existing or potential infrastructure capacity within this phrase helps to address some of the specific concerns raised.

The significance of "green links" is acknowledged, but is addressed in the spatial vision in the third bullet point under "climate change and sustainability" which reads "the network of green links will connect existing open space and wildlife habitats within urban areas and to the countryside".

Clearly, Attleborough is not within the plan area, but the concerns raised by Little Melton Parish Council recognize that matters outside the plan area will affect conditions within it and reinforce the need for any contingency plan to take account of such factors. It has been suggested above under question 1 that the need to make improvements to the key southern bypass junctions should also be viewed as critical infrastructure and this is taken into account in the addendum dealing with contingencies.

### **Question 19 Main Towns – what opportunities can growth bring?**

The key areas identified include further employment, support for local services, better use of infrastructure, and the potential for environmental improvements that development can bring. This includes green infrastructure, with particular examples quoted at Diss and Wymondham. Other more specific points include

- Some respondents, including an agent promoting sites at Diss (and suggesting an allocation of 500 dwellings), and other agents promoting sites at Aylsham, Harleston and Diss, and Saffron Housing Trust also suggest that focusing development in the right locations can lead to more sustainable outcomes, by making the best use of a well developed local infrastructure.
- One agent also makes the point that if allocations do not meet locally arising need within the locality, this will be displaced to other locations.
- A further agent suggests that, where additional retail facilities are required in small towns the correct approach is for an enhanced retail offer based on quality local retailers to be focused in the town centre rather than edge of town development
- Some agents also make the point that development at the scale envisaged in market towns can be expected to include affordable housing, assisting in social inclusion and balance.

#### **Officer Response**

There are few surprises in the responses to this question, and none which specifically require policy changes, though as noted in response to question 19, the scale of allocation proposed at Diss has been questioned and may justify reconsideration. Similarly the degree of flexibility offered by the wording in the response to question 19 may also be appropriate. Generally respondents recognize that development may enable additional facilities including retail to be supported, but there seems to be a consensus that this should be used to reinforce existing centres. In this regard, their comments align with the wording of policy 6 relating to town centre uses.

### **Question 20 Main Towns – what are the constraints to delivering the proposed level of growth and how can these be overcome?**

There were a number of general comments with infrastructure in general being referred to, the difficulties of delivery in the current economic climate and investment in transport infrastructure in particular.

Saffron Housing Trust refer in addition to the costs of renewable energy, and raise the question of our residents' objections, but believe that these can be overcome by partnership working with developers and an inclusive approach to consultation.

Norfolk landscape archaeology comment that several of the proposed development areas contain sites of archaeological importance and the impact of the development on the sites will require mitigation in the form of preservation by record or preservation in situ. They do not however suggest any specific areas where the principle of development would be unacceptable.

The main specific constraints identified were

- Sewage treatment capacity at Aylsham, with representors promoting sites arguing that the constraints are overstated and can be resolved by appropriate investment, albeit resolution of the issue might mean development at Aylsham not getting under way until 2016. Anglian Water refer to the water cycle study. The report at stage 2A of the water cycle study was the principal reason for the draft document highlighting the constraint, but it has been agreed that stage 2B of the study will include an examination of Aylsham to try to clarify the position.
- In relation to Wymondham, representors promoting sites argue that a large scale development (if Wymondham is selected for major growth) will of necessity involve heavy investment and may delay delivery. They suggest instead a more limited scale of development combined with a strategy of more, smaller sites in the town.
- In relation to Wymondham, the Environment Agency reiterates the comments made under question 18 and referring to the limitations in the capacity of the existing sewer system.
- English Heritage raise a general concern of that the impact of growth on the historic heritage needs to be taken into account in the selection of locations for growth. They specifically mention that need for the Greater Norwich Development Partnership to reassure itself that proposed levels of growth in Wymondham can be accommodated without detriment to the town's historic assets.
- Natural England refer to statutory sites which will need to be protected at Harleston, Aylsham, and Diss, but without suggesting that these fundamentally challenge the principle of development or the selection of these settlements as main towns.

### **Officer Response**

As noted above, it is essential to establish the true significance of the sewage treatment constraint at Aylsham. This will be pursued through the next stage of the water cycle study.

The other area of concern which will need some further consideration concerns the historic environment. English Heritage representatives acknowledge that there is an onus on the Greater Norwich Development Partnership to meet the scale of development set out in the East of England Plan. Their concern seems to be that the partnership should be confident that the scale of development proposed in any particular location can be accommodated without detriment to historic assets, or if some detriment is unavoidable given the overall scale of

development, it is evaluated and justified given the wider need for new development to be undertaken in an appropriate and sustainable way. At the very least this will involve collating current evidence detailing the historic assets in areas proposed for growth and a judgment being made on potential impact, mitigation, or enhancement which may be possible.

### **Question 21 main towns – how could growth in Main Towns link with your longer term investment strategies?**

Representors proposing all occupying sites clearly see a connection with their strategies, and comments along these lines were made in relation to Aylsham, Diss and Wymondham.

- A representor comments that Growth in Wymondham would help to develop the concept of a cross city development corridor with integrated high quality public transport by different modes.
- In relation to Aylsham, the representor comments that proposals for major employment at the Airport, incorporating enhanced park and ride facilities, would benefit residents of the town.
- More generally, development interests say that the development will help to support the retention and enhancement of services, and can be used to enhance green infrastructure improving connections between the town and the surrounding countryside, and can provide a critical mass in such towns and counterbalancing major centers such as Norwich, Ipswich, Bury St Edmunds, Lowestoft and Great Yarmouth
- Tesco, who operates a store in Diss, comment that growth in the town would encourage investment in the store.
- A representative promotes a previously-developed site at Silfield

### **Officer Response**

This question has not brought forward any unexpected responses, nor any which suggest reconsideration of the draft policies.

### **Question 22 Key Service Centres – what additional significant infrastructure requirements would there be?**

As in the case of the Main Towns, many people used this question as an opportunity to confirm or challenge the selection of the settlements identified at this tier in the proposed hierarchy, with a number suggesting upgrading settlements currently proposed as a service villages. In view of the diversity of the responses, these have been arranged according to the settlement in question. Settlements proposed as Key Service Centres in the draft document are marked “KSC”.

#### **Acle (KSC)**

- The Parish Council say sewage treatment capacity and a new buildings at the primary/and high schools are needed along with additional funding for health care



- Norfolk Property Services welcome the status accorded to Acle. County council owned farm land to the southwest of Mill Lane is well placed to accommodate this level of growth with the potential for good links to local facilities and the A47
- Children's services say 100 – 200 homes could generate 25 – 51 primary pupils and 14 – 28 secondary pupils. distributor expansion of both the high and primary schools

#### **Blofield (KSC)**

- Agents promoting development suggest that the northern distributor road will improve access to Blofield and that the services in the village could accommodate more than the level of growth suggested (the agent suggests 100 – 200)
- Norfolk Property Services say County Council land exists at the edge of Blofield but recognize it may not represent the strongest candidate for development
- The expected number of pupils could be accommodated within existing provision although limited expansion of the primary school may be needed

#### **Brundall (KSC)**

- A developer promoting a site to the north of Links Avenue supports Brundall as a KSC but argues that development should be more than 20– 50 dwellings.
- The same developer suggests that Brundall needs additional employment development and proposes a site to the west of Cucumber Lane should be allocated
- Norfolk Property Services say County Council land exists at the edge of Brundall but recognize it may not represent the strongest candidate for development
- The expected numbers of pupils could be accommodated within existing provision

#### **Ditchingham**

- The Ditchingham Estate say Ditchingham should be treated as a KSC rather than a service village, noting its population of 1700, the proximity of Bungay (two miles distant) and the fact that although not all relevant services are available at Ditchingham, there are accessible by public transport

#### **Dickleburgh**

- A developer argues that Dickleburgh should be a KSC rather than a service village because it can accommodate more than 10 – 20 dwellings. They promote a site in the village.

#### **Hethersett (KSC)**

- Agents promoting development and north of Great Melton Road oppose the identification of Hethersett as a Key Service Centre limited to 10 – 20 dwellings. They argue that the plan's proposals are unlikely to meet the requirements of the East of England Plan, as it is not clear how "smaller sites" will deliver 2000 homes in the South Norfolk parts of the Norwich urban fringe. They argue that Norwich policy area KSCs should not have lower growth targets than rural KSC's, and that even if Hethersett were to be viewed as a KSC rather than a major location for growth there are no barriers to a minimum of 200 dwellings being allocated – primary care facilities are believed to have a capacity of at least 180 dwellings
- The Parish Council comment that sewerage improvements are needed along with improvements to school capacity and health provision particularly for the growing elderly population. They also highlight the need for road improvements
- Councillor Dale considers Hethersett should be treated as a service village

#### **Hingham (KSC)**

- The Town Council mentioned sewerage, school capacity and health facilities (especially for older people) and roads

- English Heritage refer to the need to avoid damage to the historic character of the town
- The Diocese of Norwich support a proposed allocation of 100 dwellings at Hingham, but this should be viewed as a minimum, subject to overcoming any capacity limitations e.g. at the school.
- An agent on behalf of a landowner supports the identification of Hingham as a KSC but argues that 100 dwellings in the period 2006 to 2026 is insufficient in the context of a population of 2078 in 944 households (2001 census). This is unlikely to be enough to meet locally arising need.
- 100 homes could generate 25 primary pupils and fourteen secondary pupils. These could be accommodated within the existing high school but expansion of the primary school may be required.

#### **Horsford**

- Agents promoting development argue that Horsford should be a KSC rather than a service village as it already enjoys almost all the relevant facilities and others could be provided by development, and they propose a site at Sharpe's Hall Farm for at least 200 dwellings

#### **Loddon/ Chedgrave (KSC)**

- Thurton parish council says the growth at Loddon will lead to problems at the A146/southern bypass junction and that improvement, perhaps in the form of a roundabout, is needed
- English Heritage refer to the need to avoid damage to the historic character of the town
- Agents promoting development argue that no significant new infrastructure would be required to develop a site at George Lane, Loddon. Although some upgrades to water supply and sewage disposal may be necessary, Anglian Water would be obliged to take this into account when planning their five yearly upgrades if the sites were allocated. The developer would expect to make appropriate contributions to local infrastructure at the planning application stage.
- 100 – 200 homes could generate 25 to 51 primary pupils and 14 to 28 secondary pupils. This level to be accommodated within existing primary provision but the high school would need to be expanded.

#### **Long Stratton (KSC)**

- Agents promoting development of land at Long Stratton, to the west of the town oppose the strategy of concentration in the Norwich policy area and attempts to create a "new town"
- Other agents, also promoting land to the west of the A140, supported the identification of Long Stratton as a KSC but suggest that more than 20 – 50 dwellings should be proposed, arguing that the town that would be sustainable if public transport could be improved and therefore traffic impacts of new development would not arise. They argue that an allocation of 50 dwellings is not consistent with other rural KSC's
- Long Stratton Parish Council comment that more employment is needed at Long Stratton, especially in options two/three and that foul and surface water drainage needs to be improved.
- An agent promoting a site at Great and Little Plumstead reiterates his view that development should not be directed away from the urban area to settlements such as Wymondham and Long Stratton

#### **Poringland/ Framingham Earl**

- Agents promoting development say there should be an allocation at Framingham Earl/Poringland. In promoting a site at Pigot lane, for

residential/employment/woodland, the agent argues that the site can provide a site at no public cost for the extension of the high school to extend the school playing field, would improve public access to Poringland Wood, provide local employment and prove easy to drain by means of a positive surface water system via a network of existing ditches flowing to the northeast which can help resolve some of the existing surface water drainage problems in the area as well as providing for the site

- The Diocese of Norwich supports the selection of the settlement as a KSC but object to the lack of an allocation here. If there is a large commitment, it is because current allocations are not being implemented and this should prompt a review of them. Even if this concludes that they should be retained, this is not a reason to restrain further allocations. The Diocese suggests an allocation of 100 dwellings.
- The Parish Council welcome the moderate growth proposed and say that limited employment facilities restrict Poringland's potential as a KSC. They refer to the "five village plan"

### **Rackheath**

- Agents acting on behalf of the landowner acknowledge the suitability of Rackheath for development, and the emerging proposal for an eco-town. In relation to the wording of the Regulation 25 document they argue that Rackheath should not be viewed as a service village but is capable of accommodating significantly more development than 10 – 20 new dwellings and suggesting that their client's land in the area of Wroxham Road/Green Lane West/ Wendover Road should form part of the spatial strategy either in its own right or as part of a larger scale development.

### **Reepham (KSC)**

- English Heritage refer to the need to avoid damage to the historic character of the town
- 100 – 200 homes could generate 25 – 51 primary pupils and fourteen – 28 secondary pupils. This would require expansion of the primary and secondary schools.

### **Wroxham/Hoveton (KSC)**

- Agents promoting development support Wroxham as a key service centre and have proposed sites for consideration under the strategic housing land availability assessment
- Salhouse Parish Council comments that significant levels of growth would require a bypass or improved road links in Wroxham/Hoveton
- Wroxham Parish Council oppose the village's selection as a KSC and refer to the report of the inspector considering objections to the Broadland District Local Plan adopted in 2006 where similar levels of growth were considered, and not supported by the inspector, and also to the limitations of services in Hoveton. They go on to say that although "Wroxham" is promoted as a gateway to the broads the majority of services are in Hoveton (schools, primary health care, two community halls and most employment) but in recent years Wroxham has lost a full time shop/post office, public house and a number of boat yards producing employment have been redeveloped for residential use.
- Agents promoting development on behalf of a developer support the selection of Wroxham as a KSC but say the scale of the allocation identified should be treated as a minimum not a ceiling (drawing on the east of England plan for support, and referring also to the forthcoming review of the East of England plan, likely to increase housing provision requirements). They identify three parcels of land for further consideration.
- North Norfolk District Council note the proposed designation of Wroxham as a KSC which is consistent with the identification of Hoveton as a secondary settlement in

the North Norfolk Core Strategy, and the proposed development of 100 – 200 dwellings needs to be planned in a coordinated way with the Hoveton allocation as site specific proposals are developed.

- 100 – 200 homes could generate 25 – 51 primary pupils and fourteen – 28 secondary pupils. This would require expansion of the primary and secondary schools.
- 100 – 200 homes could generate 25 – 51 primary pupils and fourteen – 28 secondary pupils. This would require expansion of the primary and secondary schools.

In addition, there were a few general comments made.

- Anglian Water refer to the water cycle study
- A developer comments that generally road and public transport improvements are needed to serve rural settlements
- The Environment Agency notes that an assumption has been made within stage 2A of the water cycle study that all sewer networks are at capacity and therefore costs and timings will need to be factored into any future growth
- An agent makes the point that it is logical to make the best use of existing infrastructure when considering suitable locations but the proposed split of housing numbers between the different key service centres does not appear to reflect this. They refer to the reservations are expressed in consultation document concerning Acle, Hingham, Loddon and Reepham to illustrate their point.
- Effective expansion of schools can be disproportionately expensive, as in most cases it is not simply additional classrooms which need to be considered but also expansion of the school supporting infrastructure e.g. dining facilities, school halls etc

### **Officer Response**

The first issue concerns the identification of KSCs. It is essential that the ambiguity in the regulation 25 document is eliminated. In many ways, the selection of a growth strategy for the Norwich policy area will assist in this, by removing ambiguity of the status of places such as Hethersett and Long Stratton. Similarly, the inclusion of Rackheath in the list of candidate eco-towns in the draft planning policy statement should reinforce its identification as an area for major growth rather than a KSC.

In general however, the significant role of KSCs within the rural area means that the criteria for selection, which are set out in paragraph 7.16, should not lightly be set aside or diluted. That is not to say that at lower levels in the hierarchy (service villages and other villages) a more flexible approach to levels of development should be dismissed. It is not therefore suggested that the list of KSCs should be changed.

The level of development appropriate in a KSC should indeed take account of current services, and the level of growth in Acle, Wroxham and Reepham may be able to be reduced if sewage treatment constraints in Aylsham can be overcome.

It does seem reasonable to differentiate between the levels of development expected in a KSC in the Norwich policy area and the rural area, since in the rural area the village in question may well be appreciably larger than the

surrounding ones and may well be a focus for facilities, at least at the local level. In the case of the Norwich policy area, larger scale growth is directed to the locations judged most appropriate, and the presence and relative proximity of Norwich as a service centre means that even a relatively large villages serve as dormitories with facilities to meet local needs much more than they serve as a focus for significant surrounding rural area. Therefore the approach of making larger allocations in rural KSCs seems appropriate.

With regard to the overall level of provision and the comment that smaller sites are unlikely to produce the 2000 or 3000 dwellings assigned to the unidentified sites within the Norwich policy area in South Norfolk and Broadland, the objector seems to base his argument on a misconception that all these dwellings should be produced from sites in KSCs, service villages or other villages. In fact the Regulation 25 document is clear in policy 2 that these will be sought not only in larger villages but also on suitable sites in the urban area and modest urban extensions. Nevertheless, the wording of the document should be reviewed to ensure that this is no longer open to misinterpretation.

In common with other levels in the hierarchy, provision at KSCs cannot be seen as a ceiling, but as an indication of the scale expected. Elsewhere, in response to comments on the Main Towns, a suitable phrase providing for a degree of flexibility has been suggested.

Further dialogue with the Norfolk County Council Children's Services is needed to refine understanding of school thresholds.

### **Question 23 Key Service Centres – what opportunities can growth bring?**

The main general responses to this question concerned support for local businesses and facilities, and the prospect of more local employment. Representatives sometimes added a particular emphasis to their response, including the following

- In such cases, this would benefit not only the occupants of new development but also existing residents.
- Where mixed-use can be promoted there may be a potential to reduce the need to travel
- Development can often be the key to additional affordable housing in a village
- Development can bring landscape/green infrastructure improvements, though Norfolk Wildlife Trust make the point that while biodiversity issues can be taken into account in planned developments, they should not be overlooked in the case of affordable housing on exceptions sites
- In the case of Wroxham, it has the potential to become part of a northeast/southwest public transport corridor and because of its railway station can support rail services along such a corridor
- In the case of Wroxham, relocation of the football club, long a local aspiration, could be brought about.
- The continued presence of family housing to maintain pupil numbers can be assisted by development
- Can help to maintain land supply in the short term given the delays inherent in bringing forward large scale allocations
- Can help to remedy identified gaps in local services/facilities

- Small scale local employment sites can help to remedy one of the identified needs in the Greater Norwich Employment Growth and Sites and Premises studies

### **Officer Response**

Policy 7 refers to land being allocated for residential development and the promotion of local employment opportunities. In view of the need to promote employment on smaller sites it may be worth making the policy more explicit about employment allocations unless it can be demonstrated that there is an ample supply in each KSC (in the case of Wroxham it will be necessary to take into account employment potential in Hoveton).

The other points made are frequently valid, but do not appear to imply a change in the policy approach already suggested (although of course some of the points are raised in support of arguments to increase the level of allocation in a particular settlement, considered in relation to question 22.)

### **Question 24: Key Service Centres – what are the constraints to delivering the proposed level of growth and how can these be overcome?**

General points raised include a lack of infrastructure, or delays in its provision. Specific points include the following

- In some villages parking is an issue, coupled with traffic concerns
- Planning policy is seen as the main constraint, in the form of tightly defined development boundaries
- In the case of Wroxham /Hoveton, the limitations of the river crossing
- Heritage/ historic environment/archaeology can be constraints
- Limited public transport (the representor suggests more development can help remedy this)
- The Environment Agency point out that waste water treatment constraints apply at Reepham and Acle, and although the ranges as proposed are broadly consistent with the capacity believed to exist, they would take up all current headroom. The agency also points out that in some areas, notably Wroxham, there are significant areas at risk of flood which will need to be avoided
- Long Stratton Parish Council makes the point that new development can damage community cohesion, saying this has been the experience in the past within Long Stratton.
- Natural England highlight a number of statutorily designated areas for nature conservation which will need to be taken into account in terms of site selection and also, in the case of a larger scale development, increased visitor pressure or, in relation to wetland sites, levels of abstraction or effluent quality.
- The poor track record of various authorities/service providers in coordinating their efforts

### **Officer Response**

Many of the points raised are relevant, although mainly at the site specific level. A number of representors promoting development content that there are no

constraints preventing development of their sites. Overall, while acknowledging a site specific issues, there appear to be no issues raised justifying a change in the policy direction

**Question 25 Key Service Centres – how could growth in key service centres link with your longer term investment strategies?**

There were very few responses to this question. A few agents promoting sites referred to their clients' investment strategies and willingness to make the necessary investment to bring forward the site in question. Hethersett Parish Council refer to their work on a parish plan and that once the scale of development contemplated for their village was established it could be taken into account as the parish plan is developed. Long Stratton Parish Council referred to the need for infrastructure to be in place, including the A140 bypass, as a prerequisite for development.

**Officer response**

None of the comments implies a particular policy change.

**Question 26 Service Villages –what additional a significant requirements would there be?**

There were a few general responses to this question, but the vast majority focused on particular villages. The general responses included

- Anglian Water commented that smaller settlements such as service villages were beyond the scope of the water cycle study and would need individual assessment
- NHS Norfolk and said that the levels of growth opposed were unlikely to need significant infrastructure from their point of view
- Developers commented that there were no significant service requirements at this scale of growth provided growth is directed to the better service to villages
- Saffron Housing refer to the general need for utilities, public transport and green links
- An agent argues that there needs to be a more fine grained assessment of the development potential in service coverage is in order to identify what could achieve benefits for existing as well as new residents for example through the maintenance or improvement of facilities and services. The agent also suggests that the criteria for service villages should include a public house and some evening bus services (not necessarily every evening) to allow access to cultural events
- An agent argues that indicative levels of development are too low as collectively summing the expected growth in smaller settlements does not meet the requirement for 2000 dwellings on smaller sites in the Norwich policy area.
- Children's Services comment that the limited development being proposed would not result in major infrastructure requirements. Additional development is welcomed in villages where there is spare capacity

In relation to particular villages, many challenged the identification of settlements as "other villages" and argued that the settlement in question should be treated as a "service village". In making this point, many referred to the level of services in the village in which they were promoting sites but argued that although the village may be deficient in one of

the criteria used to select service villages (village hall, journey to work bus service to a higher order settlement, primary school, food shop) they had other facilities which are of comparable value. Settlements where this type of argument was advanced include

- Aslacton ( relevant services within reach)
- Barford ( primary school, public house, church, the village hall with playing fields, hairdressers, public transport to Hingham, Watton and Norwich.Barford also has an employment base)
- Barnham Broom ( the Parish Council say the village meets the requirements for a service village and should be treated as such since its has a village hall, a regular bus service to Norwich, a primary school, a food shop and a post office)
- Foulsham ( has all the relevant services and a number of others (listed))
- Great and Little Plumstead (In view of the development potential of the former hospital, the parish should not be regarded as a service village, but should be viewed as part of the urban fringe.No justification is given for limited scope of development in service villages. It is not clear if the figure of 10 – 20 refers to an annual figure or over the plan period.. The objector alleges that a Broadland District Council development brief for the western part of the hospital site supports housing)
- Hainford ( “substantially” meets the criteria and is close to a principal route. There is nearby employment)
- Hempnall ( two general stores, post office, community hall, church, public house, two garages and a bus service ( hourly during the week and two hourly on Saturdays).the village is suitable for development and client’s site could accommodate up to 45 dwellings)
- Wicklewood ( primary school, public hours, church, village hall and playing field, public transport, shop and local businesses. The representor argues it is close to the A47 and the A11, and development will help maintain the village’s vitality)
- Yelverton/ Alington/ Bergh Apton (should be viewed collectively as a service village as between them they provide the expected services)

A third group broadly supported the selection of the village in question as a service village but suggest a larger scale of development. Representations of this nature included

- Marsham ( good range of facilities and would help to combat deprivation – the agent suggests a form of words to offer more flexibility)
- Rackheath (but even if not selected as a major growth location has capacity for significantly more than 10 – 20 dwellings in view of local services and significant employment area.however the agent of dues that the site in question should be included as part of an eco town)
- Reedham (many services/facilities)
- Spixworth ( agents note the existing deficiency of recreational space in the village and believe that an appropriate development, albeit slightly larger than implied in the regulation 25 document, could help to remedy this deficiency.)
- Stoke Holy Cross ( could facilitate an extension to primary school)

In addition, Trowse school say that the school is at capacity but limited development of 10 to 20 dwellings would not raise issues, Brooke Parish Council contend that not all service villages are suitable for development and that only infill is suitable in their village due to landscape, drainage and school capacity constraints, Salhouse Parish Council refer to the need for improvements to footways, cycleways, drainage, northern distributor road, amendments to route hierarchy, access to rail station and telecommunications. South Walsham Parish Council supported the identification of their village as a service village but



there are needs for improvements to the sewage pumping station and the school needs “support”

#### **Officer response**

The main issue arising from responses to this question concerns the methodology of identifying service villages. Implicit in many of the responses is the argument that the approach is too mechanistic, with inflexible reliance on four criteria for selection.

The principle of relating development to the presence of services is not fundamentally challenged, but the outcome is, though mostly from the perspective of arguing that settlements which did not qualify as service villages according to the criteria in the consultation document should have done so, rather than arguing for the “downgrading” of the villages selected. Assuming that the level of a settlement in the hierarchy should be related to the availability of services, an alternative approach would be to expand the range of possible facilities and award points for their presence, and agree a threshold for designation as a “service village”. If members considered a particular criterion (for example a primary school) to be essential, this could be built into the assessment, but such an approach might give recognition to the presence of services other than those in the consultation document.

Officers believe such a re-appraisal should be undertaken and also applied to “other villages”.

It should be noted that there is an ambiguity in the published document in that Trowse is included both as a fringe parish and a service village. This should be rectified. It is suggested that Trowse should be regarded as a fringe parish, though its suitability for development will need to take into account local characteristics.

#### **Question 27 Service Villages -- what opportunities can growth bring?**

The general theme of responses to this question is that development can help to support local services, facilities and businesses, and in some cases help to remedy deficiencies. Others say that by providing and supporting additional facilities, housing in the right place may help to cut carbon emissions from existing residents by offering more services close to hand. One agent, objecting to the creation of new settlements in preference to expansion of existing, who argues there should be an even spread of residential development over all the towns, villages and hamlets throughout Norfolk. Some agents point out that new development can also bring affordable housing and local employment. In relation to affordable housing, the agent argues that local authorities should not rely on “exceptions sites”, and instead should make appropriate allocations.

#### **Officer response**

The responses to this question do not imply any significant change to policy

**Question 28 service villages – what are the constraints to delivering the proposed level of growth and how can these be overcome?**

The responses by or on behalf of landowners and developers generally argue that at modest levels of development there are few or no constraints. Where such constraints to arise, it may be necessary to consider larger levels of development in order to overcome them. Other respondents comment on the need to protect the broads area character where appropriate, local traffic issues, local heritage e.g. conservation areas, landscape and biodiversity. The environment agency point out that growth should be directed to areas not at risk of flood, and the Norfolk Wildlife Trust say that factors such as biodiversity should not be overlooked in the case of exceptions sites. Natural England refer to a number of statutorily designated sites

**Officer response**

The responses to this question do not imply any significant change to policy

**Question 29 Service villages – how could growth in Service Villages link with your longer-term investment strategies?**

There were relatively few responses to this question

- A number of agents on behalf of landowners/developers comment that their clients would be willing to make the investment necessary to bring forward the land.
- Some representors commented that 10 – 20 dwellings should not be viewed as a ceiling on development particularly where proximity and access to higher order settlements can be assured
- Some representors say that a spread of smaller sites offers more certainty of delivery than reliance on large allocations, and can be brought forward more quickly.
- For Parish Councils, development can bring higher precepts
- For water utilities any increase in capacity would be funded through the water industry's regulatory process

**Officer response**

While noting the ability of small sites to be brought forward quickly, the overall scale of development required to meet the East of England Plan means that small sites alone cannot be relied upon. The consultation document did include provision for smaller scale developments, and if the additional flexibility referred to in the officer responses relating to service villages are applied to these and to other villages, the strategy will go some way to recognizing this fact without unduly compromising its sustainability credentials.

**Question 30 Other Places – Do you agree with the approach to development in other villages, the countryside and the Broads?**

There was a wide range of responses to this question, some relating to specific localities but others raising more general points. The following points were made in relation to particular places

- An agent suggests that there should be more development directed to the “other villages”, citing paragraphs 9 and 38 of PPS 3. The agent goes on to argue that Spooner Row should be treated as an “other village”(it is close to Wymondham with a regular bus service, has a village hall, playing field and public house. There is a need to cater for continued rural population growth
- Little Melton Parish Council agreed with the approach but criticize the ambiguity of the Regulation 25 document because of its ambivalence over the status of their village as a major growth location/other village
- Councillor Gray argues that Denton should be treated as an “other village”. There is strong community spirit, Part time post office, community composting scheme, regular market in the village hall and a large number of other community activities. The village has a village hall, and although there is no school in the village it has a joint school with Alburgh, one mile away
- Easton College make a similar point about Easton. They reiterate their comment that Easton should be one of the locations selected for major growth within the Norwich policy area (support the expansion of educational facilities, build on the food hub concept and improve the sustainability of the settlement)
- Tasburgh Parish Council say that their village should be an “other village” not a “service village” (the food store is combined with the post office in the front room of a house and only survives on the basis of the presence of the post office)
- Support for the categorization of Frettenham as an “other village”. Frettenham Parish Council endorsed this view
- Long Stratton Parish Council support the approach to other places
- Salhouse Parish Council state that policy 11, dealing with the Broads needs to be strengthened in view of the proximity of proposed major development at Rackheath
- Brampton Parish Council request the inclusion of the village as an “other village” in policy 9. (active village hall and community area, bus service, within walking distance of school at Buxton). Do not wish to see major expansion, but seek capacity for limited infill. Petition signed by villagers attached to the representation. They wish to see some flexibility in terms of the conversion of existing buildings close to established dwellings.
- Wortwell Parish Council say that their village should be treated as an “other village” – it has a community centre, playing fields, public house, garage, farm shop, and a caravan site with other shops – it has more facilities than some other villages who included in the category. This view is endorsed by Councillor Gray.
- Bramerton Parish Council refer to a disused employment area and would like to see the policy provide for the conversion of such sites primarily to residential or live/work use in the interests of the local environment.
- General support from Thurton Parish Council
- A representative of says that Brampton should be included as an “other village” as it has a village hall/community area and is close to Buxton which offers other facilities such as shops and a school. The representation was supported by a petition from a number of residents of the village.
- An objector promoting a site argues that Kirby Cane should be an “other village”
- Geldeston Parish Council comment that some development is needed in “other villages” and the countryside which includes their village. There is a need to combat second homes in the countryside to enable people with local connections or employed locally to live there and support local services. Geldeston is close to

Beccles and its status should take account of that fact. All relevant facilities are close to hand within two miles.

More general comments included

- Development in such locations would be unsustainable
- An agent suggests the dwelling “target” for other villages should differentiate between those villages inside the Norwich policy area and those outside it
- An objection that there is no recognition of the value of the village halls for cultural events and the arts in rural areas. Such activities could be promoted in rural areas related to community halls or other community facilities for example public houses
- Norfolk Wildlife Trust comment that exceptions sites need to respect biodiversity in the same way as allocated development sites.
- Councillor Dale is pleased to see the acknowledgement that the plan offers some encouragement for the re-use of existing rural buildings/ farm complexes, and comments the authorities should not be excessively prescriptive about accesses in rural locations.
- The approach should not be so restrictive – there is a need for local housing and village sustainability is not the same as sustainability for large-scale growth. The social well-being of small settlements should be given more weight
- There is general support for the approach from Saffron Housing Trust, Beighton Parish Council, Thurton Parish Council, Hevingham Parish Council (provided villages are not stifled) and the Environment Agency
- The policy should include provision for the redevelopment or intensification of existing employment uses where such a use would fit within the principles of the core strategy. (an example at Frettenham quoted – closely related to Norwich and could provided jobs with limited infrastructure requirement or environmental impact
- Natural England refer to a number of specific areas to be protected for their environmental quality
- An agent comments that South Norfolk is a predominantly rural area with a higher percentage of its population living in villages or rural areas. Some opportunities for dwellings and employment should be promoted in such places to reduce the need for long distance commuting. An excessively restrictive policy will widen the affordability gap and prevent newly forming households from remaining in the area. Modest development can help to provide affordable housing, support local services and the local economy. In smaller settlements social and economic sustainability need to be considered alongside environmental sustainability. A strategy which fails to recognize this would be contrary to government guidance.
- Assuming housing numbers do not to exceed those for service villages, this level of growth would not result in major school infrastructure requirements. Housing is welcomed where there is surplus school capacity.

#### **Officer response**

A number of respondents seek more flexibility in the approach to development in smaller villages. Few however seem to seek major development. Officer responses to earlier questions have suggested adding a phrase recognizing that in service villages the indicative scale of growth might be exceeded where local services and circumstances mean that the overall aims of the strategy would thereby be promoted. While it is not suggested that indicative targets for other villages should be introduced, a similar phrase acknowledging the possibility of

demonstrable local circumstances justifying a slightly larger scale of development might be considered.

With regard to “other villages” these have been defined in the Regulation 25 document by the presence of a village hall and primary school. This is a fairly minimal level of local services, but it has been suggested earlier that a wider checklist approach might be used to identify service villages, and, if members agree this kind of approach, the same approach could be examined in relation to “other villages”. Again however the presence all of a primary school in the village, or at least within the distance which could be walked by a child might be viewed as critical(beyond a distance of two miles, children up to the age of 8 are entitled to free school transport, and it would appear inappropriate as a matter of general policy to provide for new housing beyond this distance). In general, in rural areas with unlit roads, good practice would suggest that new housing should only be permitted in settlements with a primary school.

The concerns of Bramerton Parish Council are understood. Policy 10 allows for appropriate replacement of existing buildings, and a bullet point could be added to the supporting text indicating that while employment uses would generally be favoured, residential redevelopment might be an acceptable where local environmental conditions mean that employment use would be inappropriate.

Policy 11 covering the Broads appears to be appropriate. However the concerns of Salhouse Parish Council are recognised and it is suggested that, if Rackheath remains as one of the favoured growth locations, the bullet point covering green infrastructure matters ( fourth bullet under the heading “north-east sector” currently in the appendices to the regulation 25 document) should be expanded to refer particularly to the need to ensure protection of the Broads, for example by the inclusion of appropriate informal recreation opportunities elsewhere within the northeast sector.

Policy 10, as currently drafted, allows a reasonable degree of flexibility providing for small scale commercial enterprises where a rural location can be justified and also allows for the appropriate replacement of existing buildings. This appears to be a reasonable and practical approach.

Regarding the question of culture, this is addressed in policy 18. It refers to the “protection of existing cultural assets and support for development of new or improved facilities”. The reasoned justification could be expanded to clarify that in many small settlements community halls and similar spaces may be the only cultural facility and the strategy will seek to protect these.

### **Question 31 – area wide policies –do you agree these policies will deliver the vision and objectives?**

There were a considerable number and wide range of responses to this question, which covered a wide spectrum of subjects. There were a number of general responses but many focused on a particular topic. The main points below have been arranged in this way.

General comments

- A number of respondents offered general support for these policies, though one or two expressed slight reservations. These included; Salhouse Parish Council, NHS Norfolk (but would like a health/well-being policy to identify the need for a health and well being strategy to underpin the developments) I. E. Homes, Saffron Housing Trust, EEDA express support for the rural strategy in general, but see below for specific comments, Long Stratton Parish Council (subject to infrastructure being in place), Barnham Broom Parish Council, Hevingham Parish Council, Natural England, CgMs (representing development interests at Rackheath – general support but more emphasis is needed on public transport links to employment) CSC (representing Chapelfield) offer general support for the objectives and spatial vision.
- Conversely, there were one or two general criticisms. One agent promoting development at Cringleford complains the key diagrams are insufficiently clear about residential locations, and another agent is among those commenting that some policies do not accord with PPS 12, and many merely duplicate national or regional guidance without adding a local dimension. EEDA object to the omission of a local renewable energy target.

#### Policy 12 – Hierarchy of Centres

- There was no significant express criticism of the hierarchy of centres

#### Policy 13 – Reducing Environmental Impact

- The potential for woodland should be more explicitly recognised. It can provide wood for fuel and help combat contamination/global warming
- New development must recognise the value of green space
- There needs to be a more explicit link to policy ENV 6 in the RSS. There is need for explicit policy support for protecting the historic environment. English Heritage say an assessment of the capacity of the historic environment to accommodate planned levels of growth should be undertaken. Norfolk Landscape Archaeology also stress that development should contribute to protecting the historic environment
- Major Greenfield allocations will have inevitable landscape/environmental impacts
- Councillor Dale questions the control of local planning authorities over matters of design which will be critical to the acceptability of new development – many villages already urbanised.
- Councillor Dale suggests combined heat and power installations might be linked with glass house horticulture
- Representations on behalf of a number of developers say that the policy is unreasonable in requiring all housing to meet Housing Corporation levels in the Code for Sustainable Homes. The Government is working in stages towards carbon neutral housing by 2016 and technologies are still developing. This could threaten viability and delivery and a more flexible wording promoting low carbon/sustainable construction is required rather than specifying code levels
- Others comment that policy 13 largely repeats national policies and should be removed, though one agent comments it sufficiently addresses climate change and sustainability and strikes the right balance.
- The Environment Agency say that it is not enough to require all development to be energy efficient in the introductory paragraph to the policy. It should also be water efficient. This is particularly relevant because water resources are increasingly scarce and the JCS needs to guide people to lower water use. The Environment Agency also suggest strengthening references to biodiversity/water efficiency/SUDS and waste management.

- Greenhouse Environment/Co-op Learning Network express extreme disappointment that there is no firm target suggested for carbon emissions in Greater Norwich. To help reduce the carbon footprint they suggest emphasis on local renewable energy generation. While the consultation document includes a reference within policy 19, there is no indication of how this will be brought about. They suggest the GNDP should establish a local energy company and go on to suggest in more detail how this might operate in practice.
- A number of representations offered a general support for policy 13

#### Policy 14 – Housing Delivery

- The housing shortage demands not only an increase in supply but also measures to cut demand
- A developer offers support for 40% affordable housing as an appropriate target
- Conversely, other developers argue that a one size fits all approach to affordable housing is too imprecise and targets should be set case by case, based on up to date and accurate evidence
- The policy should refer to the housing market assessment not a housing needs assessment and the percentage of affordable houses sought on mixed tenure sites should be expressed in the plan and open to challenge as it is fundamental to viability.
- The trigger for affordable houses on mixed tenure sites should not be less than fifteen dwellings. The objector also believes that the requirement in terms of the percentage sought should be graduated as in the issues and options document
- Shelter say that the policy will not meet housing need in full. Policy 14 does not relate to the RSS target of 35% affordable housing. The target should be in policy and should seek to meet the 43% need identified in evidence. Furthermore it should reflect the regional tenure split of 65% of affordable housing being provided for the social rent
- The Diocese of Norwich say the affordable housing expectation should be put in the policy to be tested
- The County Council’s Planning, Transportation, the Environment and Waste Review Panel reflected on the importance of design and building a variety of houses to encourage community development and housing for life.
- An objector promoting a site at Diss argues the housing distribution does not accord with the regional spatial strategy as a consequence of the definition of the Norwich policy area
- The Greater Norwich Housing Partnership comment that the policy represents an excellent direction of travel, and support it.
- South Norfolk Council (housing team) refer to the statement at paragraph 8.6 that 43% of overall housing need can only be met by affordable housing. The source (ORS Greater Norwich study) should be quoted. The reason for 40% being selected when 43% has been identified as the level of need, and 35% is quoted in the East of England Capital Plan should be made explicit. Recommend wording the text as “a minimum of 40%” so that numbers will always be rounded up. They also expressed strong reservations about the proposed method for calculating be commuted some in respect of off-site provision of affordable housing, and set out their detailed suggestions. In general this would change the emphasis from a request by the developer leading to offsite provision to it clearly being a last resort. They believe (paragraph 8.8) that the explicit requirement for local housing needs assessment could lead to further delays in the provision of much needed affordable housing and suggests that district-wide assessments together with local authority housing registers can provide adequate objective support ( though acknowledge

that on some occasions a local needs assessment will be needed). They suggest a rewording of the paragraph.

- Friends and Families of Travellers are broadly happy but believe the limitation on traveller sites size of 12 pitches is arbitrary and should be deleted. The linkage of sites to specific routes does not meet the needs of the travelling community as a whole, especially for long term/ tolerated stopping places and should be led by policies on affordable housing. The policy should provide for traveller pitches beyond 2011 and should not rely on the review of the RSS.
- The policy is too closely tied to the housing market assessment/latest evidence as a determinant of housing variety and affordable housing levels and more flexibility should be built in.
- A number of representations, referred to under the questions relating to the settlement hierarchy state that the scale of allocation envisaged is not likely to deliver enough houses and that the indicative ranges for different levels and the hierarchy should be seen as a floor rather than a ceiling

#### Policy 15 –The Economy

- One representor expresses general support for the employment policies but argues they should not be too restrictive particularly at the Airport and Hethel. The same objector goes on to support the aspirations for higher and further education expansion and to support the plan's emphasis on accessibility of employment locations
- Other representations expressly support the emphasis on meeting the needs of small and start up businesses and the allocation of smaller employment sites.
- Thurton Parish Council said the economy chapter/policy should explicitly refer to construction
- Norfolk Wildlife Trust are concerned that some aspects of the policy will contribute to economic development but not to "sustainable" economic development.
- The Theatres Trust support the policy
- Bidwells, promoting a site on behalf of Mr. Presslee challenge the conclusion in the Arup study that all the listed employment sites should be protected. They argue that some are unsuitable and refer to sites in Norwich in the vicinity of Waterworks Road where planning permission for residential redevelopment has been granted.
- Policy 15 does not meet the regional spatial strategy requirements – it needs to have a job that target related to the plan period to 2026. The same representor welcomes bullet point 4 of the policy but believes the delivery of sites is uncertain.
- An objector, in promoting a site for employment use at Drayton, makes a number of comments on the economic growth and sites study undertaken by Arups on behalf of the GNDP. In particular, while the study recognises considerable levels of deprivation in the north of the city, the only strategic employment allocation in that sector is the Airport which is likely to be occupied by a range of users benefiting from an airport location. The study recognizes (para. 14.2) that construction is likely to be a major growth area and the representation seeks to promote land at Drayton to contribute to the growth in the construction industry and possibly help develop a "construction hub".
- An objector, promoting a site at Reedham, argues that the current policy on the economy is in much less supportive in rural areas than one of the options offered in the earlier issues and options consultation ( which received a large measure of support), and urges that there should be a greater emphasis on promoting small-scale employment in rural areas (addressed in the last part of the policy)



- Councillor Clancy and Broadland economic development officers make a number of points intended to increase flexibility in the way in which enterprise, growth and business expansion is supported
  - Under the heading “the local economy will be developed...” add a third bullet point “encourage and assist expansion of appropriate businesses in rural areas”
  - Amend the second heading commencing with the word “sufficient” to read “sufficient employment land will be allocated in suitable locations to meet identified need and provide for choice. In particular...” ( i.e. substituting the word “suitable” for the phrase “in accordance with the spatial hierarchy”)
  - Under the heading “opportunities for innovation, skills...” Amend the first bullet point to refer to “.. vocational, further and higher education” (i.e. adding the word “vocational”)
  - Under the same heading delete the second bullet point “support for the establishment of a retail academy” ( on the grounds that while academy developments are desirable and retail is a significant offer for Greater Norwich, the focus for such efforts should be directed at higher level roles as supporting the Greater Norwich outline economic development strategy
- EEDA make a number of points about the policy
  - The policy should refer to the strategic sub-regional ambitions of EEDA (which are set out in full in their representation)
  - There is concern at the lack of detail in the policy. There is a need to reflect the findings of the Arup study including the scale of the allocations and would like to see references to the Arup study as evidence for site selection within the JCS
  - Support for the roles of market towns and key service centres as set out in the strategy
  - Support the spatial strategy including locations for major change and development

#### Policy 16 – Strategic Access and Transportation

- EWS said the policy should be more explicit about protecting rail freight infrastructure
- Councillor Dale refers to the chart at paragraph 4.4 showing external linkages and refers to the limited capacity at Thorpe station and its approaches. Further consideration should be given to re-establishing disused rural railway stations with additional trains in path gaps between existing services
- Councillor Dale suggests consideration of guided bus ways on one or other of the former railway beds into Norwich ( Marriott’s Way and Lakenham Way).and suggests that Marriotts Way could offer the opportunity to enable development to the north west of Norwich.
- Thurton Parish Council say the policy needs an innovative approach to communities such as cycling from park and ride sites, better connectivity between cycle routes and mini park and ride based on public car parks
- The National Trust generally support the policy but not the open ended support for airport expansion. A very similar point is made by Norfolk Wildlife Trust who contend that support for the airport is incompatible with aspirations to combat climate change
- A representor, promoting a residential site at Loddon, supports the emphasis on connectivity between housing, employment and facilities.

- An objector promoting a site at Diss comments that the policy should not rely on major development at Long Stratton as the bypass is not a commitment.
- Norfolk Wildlife Trust point out the tensions between some transport proposals and environmental considerations and suggest that the policy ought to explicitly acknowledge that some transport schemes will support some objectives but not others.
- EEDA make a number of points about the policy
  - There is a no reference to the Transport Innovation Fund study undertaken by Norfolk County Council or to demand management in the policy
  - Support for the element of the policy relating to the airport
  - Should reflect the Greater Anglia Route Utilisation strategy, in particular improvements of the rail service between London and Norwich and connections to the Midlands
  - Support for recognition of the A11 and NDR as critical, but not for the A140
- The Environment Agency say the policy should be explicit that the environmental benefits of the NDR apply specifically to the human environment
- Councillor Dale suggests that rising fuel prices combined with climate change could result in flood-risk to some rail assets and may necessitate the development of a new rail interchange. He contrasts this with the congestion on the B1108 and Newmarket Road which would serve the development in the south west.
- An agent promoting development offers general support but suggests there should be more emphasis on public transport links between housing and employment sites

#### Policy 17 – Environmental Assets

- Norfolk Wildlife Trust express their support
- The Environment Agency suggest changing the word “maintenance” to “long term enhancement of the status quo” in the first bullet point
- Representations promoting various sites support the aim of the policy and believe their site complies.

#### Policy 18 – Communities and Culture

- The Diocese express their desire to be involved to promote community cohesion and comment that it would be desirable to find ways to combat migrants dominating the housing market for the purposes of speculation
- The Norfolk Cricket Board support the policy but refer to the need for cricket facilities and developer contributions towards their maintenance
- The Theatres Trust express their support
- The police say “secured by design” should be a requirement not a recommendation.
- Children’s Services generally support this policy but say it would be helpful if the reference under “education” referred to “high quality” provision.
- Representations promoting various sites acknowledge the need for new development to meet local needs and contribute to work appropriate to local facilities. Easton College are seeking to develop a local farm shop.

#### **Officer Comments**

**Policy 13 – it is suggested that the tentative views expressed below should be discussed with the master planning and environmental delivery group before any redrafting of the plan is undertaken**

A study is currently underway, following government guidance set out in PPS1, to establish appropriate local energy efficiency standards, more rigorous than those established in the Regional Spatial Strategy. It will take account of local potential and viability issues and will also consider the potential for requiring housing development locally to achieve higher energy efficiency standards than those required by the Code for Sustainable Homes. It will look specifically at the potential for developing local energy companies. This study will inform further LDF policies on this issue.

It is accepted that there should be a focus on water efficiency in the policy to ensure that limited local water resources are used and strengthened references to biodiversity/SUDS and waste management. The findings of the latter stages of the Water Cycle Study will inform policy development.

It would be inconsistent for the policy to refer to explicitly to woodland but not to other forms of renewable energy. Similarly, though CHP may have a role to play, the policy should not focus on one form of renewable energy. The use to which such sources of renewable energy are put should also not be too prescriptively defined, for example it may be used to supply the energy demands of major developments.

The study referred to above will also enable an appropriate target to be included in the submission document.

There is a reference to the historic environment in bullet point 6. In response to a dialogue with English heritage, a desktop exercise is being undertaken looking at the potential impact of potential development locations on historic assets. Policy 17 explicitly seeks to direct development to areas where it would “provide the opportunity to enhance...historic character”

The value of green space is recognized in policy 17.

It is acknowledged that water resources are a critical factor, and though the policy refers to the need to make sustainable use of resources including water, it would help to get more prominence if the introductory paragraph referred to “energy and water efficient”

Policy 13 is consistent with national policy (with one exception – see below) but it is still considered useful to gather together environmental aspirations in this way.

A number of objectors have challenged the aspiration that all housing should meet current Housing Corporation requirements. This is probably a reasonable stance, as a blanket policy like this would be difficult to substantiate if it sought as a general rule in effect to rewrite Building Regulations. However in the case of specific developments, where appropriate, it might be reasonable to seek higher standards. This should, however, be on a location by location basis.

**Policy 14 it is suggested that the tentative views expressed below should be discussed with the GNHP before any redrafting of the plan is undertaken**

The overall target is set nationally and regionally, and seeking to manage demand for housing is not within the remit of the GNDP

Clearly affordable housing targets should be based on evidence, and in this case the most up to date evidence is in the housing market assessment (though the housing needs assessment was undertaken as an evidence study to support the housing market assessment) and the reference in the policy of under the subheading “affordable housing” should be to the housing market assessment. At the site allocations stage it may be possible to differentiate the level of affordable housing sought on a particular site, but at this stage without knowing the characteristics of a particular site it is not possible. There should be no reason why a greenfield or predominantly greenfield site should be unable to produce 40% affordable housing – that level has been secured on some recent developments in Broadland. Notwithstanding the argument that 43% is required to meet the full identified need, it is still considered reasonable to seek 40% given the pragmatic need not to stifle development and to secure contributions to other necessary infrastructure from development.

Two studies currently ongoing will clarify the commercial viability of this target.

It is accepted however that the percentage sought should not only be set out in the plan (as it is) but elevated to policy status, but with the proviso that it will be varied more up to date evidence emerges.

The threshold for seeking affordable housing was explicitly set below 15 (the national guideline) in view of the high level of need within the city of Norwich and the likelihood that a number of the sites coming forward in the area where need is greatest are likely to be relatively small. It is therefore still considered appropriate.

In response to the points made by itself Norfolk council housing team, it is accepted that a brief cross reference to the source of the data would be appropriate. It would not be realistic to refer to “ a minimum of 40%”, as there will be occasions when viability considerations will necessitate a lower proportion of being accepted. It is accepted that off-site provision is generally speaking a last resort, and the third sentence of paragraph 8.7 should be slightly amended. The requirement for specific local needs assessments relates to settlements which fall below the category of “other villages” and are therefore, by definition, do not have a village hall and primary school. It is considered appropriate that new affordable housing in places it without these most basic of facilities should be justified by some specific assessment.

The tenure split should be determined by reference to local rather than regional evidence.

The comments on the Gypsy and traveller policy are accepted. An arbitrary limit of twelve pitches for a site is excessively prescriptive, although the principle of a number of small sites to meet the needs of differing groups of travellers still remains valid. Some rewording is needed however. Furthermore the East of England Plan single issue alteration includes a formula for extrapolating need beyond 2011, and it is reasonable to expect the strategy to follow this lead unless more up to date evidence pointing in a different direction is produced. Again the policy needs rewording

The overall scale of allocation will need to be checked against the most up to date housing commitment position.

**Policy15 - it is suggested that the tentative views expressed below should be discussed with the economy group before any redrafting of the plan is undertaken**

The policies relating to the Airport and Hethel. In policy 2. It is important to strike a balance between undue rigidity and diluting the distinctive specialisms of particular areas, but it is suggested that the wording in relation to the Airport might more closely follow the regional spatial strategy's phraseology along the lines of "uses clearly benefiting from an Airport location" and in Hethel, rather than refer to "high technology engineering", the phrase might be widened to "high technology design and manufacturing".

In terms of construction, there is an established facility run by CITB at Bircham Newton, and there is no evidence to suggest this needs to be replicated. There is no suggestion that any obvious benefits of clustering would accrue to the construction industry in terms of day to day operation.

The policy does not appear to indicate an embargo on all of the sites looked at by the Arup study, but the point made by EEDA that the scale of allocations needed and a reference to the study as evidence would be appropriate. This does indeed need to take account of anticipated jobs growth to 2026 and the policy will need to be amended to reflect this. It should clearly set out the area of land to be allocated for employment purposes.

A cross reference to EEDA's sub-regional ambitions would be appropriate, but it is unreasonable to quote them in full without equally full coverage of other relevant strategies. This would be inconsistent with the need for a core strategy to be reasonably brief and readable.

It is accepted that the policy should be slightly amended to include a reference to supporting rural enterprise, although the detailed policies in the spatial hierarchy do acknowledge the acceptability of employment uses of an appropriate scale at all levels of the hierarchy.

It is hard to see how the plan could promote allocations not in accordance with the spatial hierarchy, but the introduction to the second set a bullet point could be phrased "sufficient employment land will be allocated in a suitable locations having regard to the spatial hierarchy, to meet identified need and provide for choice..."

In the first bullet point of the third series it is accepted that adding "vocational" would improve the policy

With regard to a retail academy, it is agreed that there should not be an explicit commitment to an academy for this sector unless there is a similarly explicit reference in the draft Greater Norwich Economic Strategy.

**Policy 16 - it is suggested that the tentative views expressed below should be discussed with the transport group before any redrafting of the plan is**

## **undertaken.**

Many of the issues raised four within the remit of the local transport plan, and NATS. The following observations should be read in the context

The policy says little about freight in general and this should be re-examined

All parties would support making the best use of rail infrastructure, but there appears to be few disused rural stations well located to communities big enough to justify their reopening. Marriotts way could form a transport connection, but there are other reasons why the north west area has not been selected for major growth (including sewerage constraints, limited access to strategic employment locations, a difficult radial route to improve, and the likelihood of cross valley traffic between A1067 and A47 corridors where realistic improvements to the very minor existing network of roads do not appear feasible, across a river which is of international wildlife importance).

Bullet point 6 refers to locating developments in places which encourage walking and cycling, but the policy might be strengthened by referring to the need to improve walking and cycling facilities particularly in the Norwich area.

Norwich International Airport does indeed present a dilemma. It is a valuable asset to local people and businesses, and in terms of raising the profile of the area, yet aviation is always associated with environmental issues. The policy could be amended by referring to support within local environmental constraints which might help to give assurances about local traffic and noise consequences.

Major development at Long Stratton would be expected to fund the bypass. The reference in the supporting text to the policy at paragraph 8.18 is accurate in its description of the scheme's status.

While climate change will affect the area, little railway infrastructure lies within the zone likely to be affected by 100 year events, though more, including Thorpe Station, is likely to be affected by 1000 year events. The second bullet point in the policy could include a reference to the Greater Anglia Route Utilisation Strategy. The Transport Innovation Fund bid was intended to examine the potential of demand management. There is no commitment to demand management in NATS at present

The fourth bullet point in the policy could refer to " environmental conditions for people in the area" to recognise the environmental sensitivity of major road construction.

The point about public transport links between housing and employment is well made, but is covered in policy 5 as regards locations for major change and development, policy 4 on the out of an area, policy 3 on the city centre and is included in a generic way in the second set of bullet points.

## **Policy 17**

The points made by the Environment Agency are acknowledged, but it is considered that a "no detriment" position may be all that is attainable in some

instances. The policy does allow for enhancements where possible.

### **Policy 18**

Children's Services are correct in that it is not simply the presence of provision but the quality which should be an objective. It is suggested the policy be amended as they request. With regards to requests by the police and Norfolk Cricket Board, no amendment is suggested, as "secured by design" is a voluntary accreditation process and it would not be reasonable to seek to impose it on all developers, however laudable the objectives. Likewise, new development should make adequate provision for recreation, but it would be inequitable to single out one sport above all others.

### **Question 32 – Do you support our approach to funding infrastructure and promoting quality in new developments?**

The overall response can best be summed up as tentative support. There were expressions of support from a number of respondents including Hethersett Parish Council, Thurton Parish Council, Pegasus planning ( promoting employment land at the "Postwick Hub" Salhouse Parish Council, NaturalEngland, Nathaniel Lichfield, CSC, I. E. Homes, T. W. Gaze promoting sites at Diss and Long Stratton, Barnham Broom Parish Council, CgMs promoting a site act Rackheath ( although the policy could go further in terms of community development)

The chief reservations expressed can be summarized as follows

- Anglian Water stress how critical strategic infrastructure is, and that the strategy needs to take into account practicability as well as sustainability. Policy 19 hints at this, but could be strengthened.
- CgMs, promoting a site at Cringleford support the CIL proposal including the recognition that viability assessment needs to be done and support the plan's aim to achieve quality but consider "accredited participatory design process" needs further explanation
- The National Trust are concerned that green infrastructure should be given greater weight and provided within the plan area and beyond it to control pressure on fragile National Trust sites from a growing population
- Savills, promoting development in the northeast sector say that there is a need for a bespoke approach to masterplanning in this area
- Hevingham Parish Council say that the CIL is simply another form of taxation to raise funding hitherto financed by national taxation and should only be introduced as a last resort.
- An agent comments that the criteria and approach should be different in rural areas and villages compared with a major areas of growth, but public transport and carbon reduction are important throughout the area
- Breckland District Council point out that the plan needs to take account of growth beyond the plan area in infrastructure planning.
- Norfolk Wildlife Trust are concerned at the low priority accorded to green infrastructure. They refer to mid Bedfordshire, where the local authority has developed a costing based on the implementation of a district-wide green infrastructure strategy. The Trust argue that the partnership should have a green infrastructure implementation strategy and that green infrastructure should have a guaranteed top slice of CIL revenues

- South Norfolk council (housing team) refer to the statement at paragraph 8.6 that 43% of overall housing need can only be met by affordable housing. The source (ORS Greater Norwich study) should be quoted. The reason for 40% being selected when 43% has been identified as the level of need, and 35% is quoted in the East of England capital P. Ian should be made explicit. Recommend wording the text as “a minimum of 40%” so that numbers will always be rounded up. They also expressed strong reservations about the proposed method for calculating be commuted some in respect of off-site provision of affordable housing, and set out their detailed suggestions. In general this would change the emphasis from a request by the developer leading to offsite provision to it clearly being a last resort. They believe (paragraph 8.8) that the explicit requirement for local housing needs assessment could lead to further delays in the provision of much needed affordable housing and suggests that district-wide assessments together with local authority housing registers can provide adequate objective support ( though acknowledge that on some occasions a local needs assessment will be needed). They suggest a rewording of the paragraph.
- Les Brown Associates say that the application of a CIL must avoid charging developers for facilities funded by commercial enterprises (e.g. utility providers, dentists) and the list in table two needs to be re-examine to avoid such risks.
- Persimmon homes and Gladedale Homes support the concept of the CIL but it needs a clear link between the development plan process, the charging schedule and the infrastructure strategy. There is a need to avoid double counting between CIL and S. 106 obligations. They also express their concern about the requirement to guarantee development in full and the future maintenance of infrastructure.
- The Theatres Trust object – it is not clear that the arts or cultural interests have been included in the policy all tables in the appendices describing what will be covered by CIL/S106. If they are included in the general term “community facilities”, this needs to be made clear.
- Savills, promoting an employment site at Harford say that this could help to deliver significant green infrastructure as it would contribute to the River Yare parkway
- The Greenhouse Trust states that the strategy needs a firm carbon reduction target and suggests the GNDP should establish a local energy company.
- CPRE argue that some of the assumptions on major infrastructure to meet development need (in particular the northern distributor road) are flawed. The overall target should be scaled back.
- Norfolk Constabulary say there should be specific reference to police infrastructure and that this was accepted at the examination into the North Norfolk District Council core strategy. They include an extract from the inspector’s report supporting their case.
- Long Stratton Parish Council say there should be no commitment to develop until all funding is guaranteed. They say more emphasis should be given to upgrading telecommunications to optic fibre operation
- Keymer Cavendish, promoting a site near Thorpe End, offer their support to the approach except for the maintenance of affordable housing (the last bullet point) in policy 19. They also say the list of infrastructure in table 1 is excessive and should not include health or utilities which have separate funding streams
- English Heritage say a bullet point should be added on the protection and conservation of the historic assets of the area, and conservation/archaeological heritage should be added to the second set of bullet points.
- Norwich Green Party have no fundamental objection to the CIL as a means of funding but seek more clarity on the democratic accountability of the bodies to manage the resultant funds they raise the question of how such bodies would relate



to economic development boards as envisaged in the current unit tree proposals. They also expressed the view that CIL should not be charged at a single rate, but should take account of the need to encourage development on brownfield sites, and would like to see more emphasis on the use of CIL to promote biodiversity and environmental gain.

- Keymer Cavendish are concerned that the CIL will render development unviable, and comment that it should not be charged at a uniform rate but should take into account the additional costs of developing brownfield sites. The list of facilities and services to its development is to contribute is in practical in the current market. In the short term only smaller sites which can take advantage of current infrastructure will come forward and the should be promoted in order to maintain a short term supply. The list of services includes some such as primary health care and dentists which are private sector services and should be funded by the operators themselves. Similarly utilities funded by capital programmes authorized by regulators should not be beneficiaries of CIL.

### **Officer Response**

The first point to make in response to a number of the representations, including those from Les Brown Associates, Persimmon Homes and Gladedale Holmes, CPRE. , Keymer Cavendish, and Norwich Green Party is that the GNPD has commenced a study into infrastructure needs, potential funding streams and the scope for securing developer contributions. This will build on earlier work by EDAW and will include a finer grained examination of infrastructure needs in localities where development is proposed. It will also take into account emerging government guidance on a potential CIL, but it should be stressed that the value of this work will lie as much in providing evidence for the partnership in securing funding from various mainstream sources as it will in securing developer contributions. An integral part of this work will, however, be to identify those elements of infrastructure where other sources are available and therefore set appropriate parameters for the seeking of developer contributions (either through S. 106 obligations or CIL). The study will take account not only of local infrastructure needs but also identify those elements of wider sub-regional significance including the impacts of growth beyond the plan area.

The reference to an “accredited participatory design process” refers to something such as “ Enquiry by Design” promoted and offered by the Prince’s Foundation, which expressly engages the local community along with professionals in the drawing up of more detailed proposals. However it would be unreasonable to specify a single proprietary engagement process to the exclusion of others, and the phrase used appears to be a reasonable generic description. Such an approach would appear reasonable for the northeast; it is important that the result is bespoke, but that should not diminish the usefulness of a tried and tested process. Similarly, if such an approach should be applied to the rural area, a bespoke outcome, reflecting the character of the area, should be attainable.

It is hard to see why anyone should conclude that green infrastructure is given a lower priority than other aspects. A green infrastructure strategy has been drawn up and will form an integral part of the infrastructure needs study referred to above. Similarly, the policy does refer to crime prevention, and the list of potential infrastructure of women’s in the appendix to the regulation 25 document includes

community safety. There is no reason why cultural facilities should not be included in the overall heading of the infrastructure, though it is accepted that the wording of the plan are present does not make this clear, and some rewording would be appropriate. Similarly, it should be made clear that the historic assets of the area are an important part of its character and where these form a public asset, should be included.

## Other Points Raised

A number of other points were raised in representations which did not readily fall within the scope of any of the questions asked. Some simply expressed general support for the strategy, while others challenged aspects These covered matters such as

- Opposition to the level of growth required by the east of England plan
- The converse view that the plan needs to include allocations sufficient to deal with the review of the East of England Plan
- The suggestion that the description of potential growth location in the north east as in the “ Sprowston/ Rackheath area” is too limiting and of the entire northeast and quadrant should be included
- Arguments by some agents that their clients’ land should be released early on the grounds that small sites can come forward quickly and provide a supply while larger sites are being made ready.
- An emphasis on the importance of river valleys and that paragraph 4.2 should refer to the Yare and Tas as well as the Wensum, and they should be referred to in objective 8 and policy 4
- The need for community facilities including some for youth in or developments
- Support for policy 10 and suggesting the use of a previously developed site at Bawburgh for water based recreation, quoting paragraph 12 of PPG 17 and support
- An argument that Plumstead hospital should be treated as part of the urban fringe, and that previously developed sites such as this, should be brought forward ahead of greenfields (i.e. without particular reference to locational considerations
- The need to strengthen the plans vision as regards the protection of the historic environment including a reference in objective 8 (detailed wording suggested)
- A number of service providers (including NHS Norfolk and National Grid) confirm the need for investment given the scale of development proposed
- Rural development is needed to maintain the sustainability of rural settlements by supporting local services and therefore limiting the need to travel of existing residents. Rural accessibility cannot be improved by urban concentration
- Breckland District Council seek clarification on the statement at the table at paragraph 4.4 (column headed “south west”) that “the Brecks are an important visitor attractor with further potential”. Any claim that the Brecks have further visitor potential needs to be tested through an appropriate assessment
- Salhouse Parish Council oppose the lack of alternative strategies in the north east, refer to inconsistencies in the maps some of which show itself house within the NPA while others show it outside, and seek clarification on the place of the locations for major growth in the NPA listed in policy 2 in the settlement hierarchy. They also ask that the overall scale of housing required (expressed in a table under policy 14) and translated into the settlement hierarchy is expressed more clearly

- The lack of a published sustainability appraisal could render the plan unsound
- Nor is considerations should limit allocations around Norwich international Airport
- The strategy is predicated on a fixed Norwich Policy Area and apportionment of housing numbers therefore no options of the split between NPA and rural areas are offered. This means the plan is unsound.
- The Greenhouse Trust make a number of points outside the scope of the specific questions
  - There is a need for a specific carbon reduction target
  - Challenge of the area's past green performance
  - Challenge assumed growth at Norwich international Airport and Stansted in the external linkages table
  - Challenged the link between economic growth and well-being and suggest targets are based on the new economics foundation
  - Suggest a pilot scheme to convert existing village schools to "community learning centres" ( based around grouped home schooling) has a more economic/effective alternative to traditional approaches to education and rural areas
  - Stress need for viable useful historic buildings are taking into account eco – standards
  - Challenge the northern distributor road
  - Focus on new development should be minimizing transport, but reliance on BRT not enough –proposed consideration of light rail transit/ tram train
  - Support Self sufficiency, car clubs and all new development in villages controlled by community land trusts
  - Support grant/aid for small business
- CPRE believe the rationale for the northeast is to support the NDR, and believe the housing downturn will be protracted, undermining the credibility of the RSS. 40% affordable housing will not be realistic if contributions are required to the NDR or Long Stratton bypass. Oppose selection of Rackheath and Long Stratton for major growth. Broadly similar sentiments are expressed by the Norfolk and Norwich Transport Action Group.
- Norwich International Airport should be relocated to Wymondham and the site redeveloped
- The need to acknowledge the potential impact of waste disposal facility on the west fringe of the Norwich urban area
- North Norfolk district council broadly endorse a strategy and specifically the NDR and would welcome a new rail holds in the north east. They seek involvement on cross border issues (e.g.at Wroxham)
- EERA said there should be renewable energy targets and targets for the use of previously-developed land.they also comment on policy 13 and the issue of waste management/construction waste
- The environment agency suggests the spatial vision and should include stronger references to water quality, flood risk and the need to strengthen biodiversity reference. The objectives are broadly welcomed although references to flood-risk and zero carbon development should be strengthened.
- Cringleford Parish Council seek no more than 50 dwellings, and question why existing commitment at Poringland should preclude further allocations there.
- Tasburgh Parish Council question why they should be no development allocation at Aylsham solely on the grounds of sewage treatment works capacity.they also comment that the expansion of employment at Hethel will draw traffic through minor roads and has very poor access by public transport cycle etc

- One representation suggests that rather than a series of developments a single large town should be considered
- Norwich Green Party highlight their concerns over some of the major growth locations proposed, and referring to earlier submissions by promoters of development in these areas at the issues and options stage. They also refer to the economic downturn and concluded that the plans are housing provision is excessive.

### **Officer response**

Some of the additional points challenge national policy, or otherwise go beyond the scope of planning policy. However some raise issues which do need to be picked up in future work. In particular

- Appropriate assessment work needs to be examined so that the partnership can be satisfied that environmentally sensitive assets beyond the plan area will not be damaged by the strategy
- As the favoured strategy for major growth in the Norwich policy area is established, it should be possible to remove some of the ambiguities about the status of certain settlements ( Hethersett is a good example – its status as either a major growth location or as a key service centre will be resolved by this decision). However a number of respondents have clearly found some difficulty in understanding the relationship between the housing provision needed and the plan’s proposals to meet it, and this will need to be addressed in subsequent editing.
- Considerable work on the sustainability appraisal, including the three options subject to consultation, has been undertaken and will need to be finalised before the pre-submission publication can be produced.
- One representor questions the lack of an option for the Norwich Policy Area boundary. This raises the wider question of the status of earlier consultation work undertaken before the new regulations came into effect (the issue was specifically covered in the issues and options consultation). The partnership’s view was that such earlier work should not simply be discarded but should be taken into account, and indeed it was in the preparation of draft policies and options for growth in the regulation 25 technical consultation document. This position has not been challenged by Go East.
- There are inconsistencies in some of the maps relating to the definition of the NPA (the specifically the inclusion of exclusion of Salhouse). These needed to be resolved (with Salhouse inside the NPA, unless members take a different view). Once of the favoured option for accommodating growth in the NPA is agreed, the proposals maps will, however, need redrawing to indicate clearly the areas to be covered by area action plans covering major growth locations. These will not be formal allocations, but the boundary of the AAP should relate to identifiable features and should be large enough to encompass the scale of development needed in the location in question.
- Clear monitoring targets will need to be defined before the pre–submission consultation document can be produced. Some work has already been undertaken on defining these (and relating them to national indicators where possible). These will need to include carbon emission targets/renewable energy targets and targets for the use of previously

developed land, among others.

- Alternative locations in Broadland were considered at the Issues and Options stage and have been subject to sustainability appraisal and investigation through evidence gathering all of these point to the North East being the best option in Broadland, and at this stage it was not considered appropriate to create options unless they were realistic alternatives.
- In view of the status of Aylsham as a main town, work needs to be done through the completion of the water cycle study to ascertain how severe the sewage treatment works constraint is, and whether it can reasonably be overcome so that appropriate allocations could be made. The consultants undertaking the water cycle study have been made aware of this requirement.

### Significant points from Evidence studies

#### Infrastructure Need and Funding Study

- The study did not compare the options in the Regulation 25 document. It considered two potential scenarios:
  - i) Urban extension to the north east of Norwich (7,500 dwellings) and an extension to Wymondham (3,500 dwellings)
  - ii) A new village of 10,000 dwellings to the west of Stoke Holy Cross and north east of Mulbarton

Study identifies what of the following types of infrastructure are required to facilitate the two growth scenarios

- Social infrastructure (education, health and community facilities)
- Transport infrastructure
- Economic infrastructure
- Utilities infrastructure

EDAW concluded that option 2 would not deliver the 33,000 homes needed to meet the RSS minimum target. Because of this the study only examines the delivery of the infrastructure requirements of option 1. The study also concluded that option 1 alone represented a high risk in relation to meeting the target and recommended future studies are based on spatial growth solutions that are a combination of scenario 1 and scenario 2 or another major growth location.

#### Developer contributions and funding gap

The study estimates that the likely contribution from housing development would be £10,000 to £15,000 per dwelling. It estimates total contributions for scenario 1 as totalling £165,509,000. This leaves a potential funding gap as the developer contribution would not pay for the identified infrastructure.

## **Public Transport – Greater Norwich Joint Core Strategy Public Transport Requirements of Growth**

Considered four scenarios – these include the three options in Regulation 25 document.

### **General conclusion**

From a public transport point of view, locations to the northeast and southwest favoured. Having these two locations offers the best opportunity to implement a cross-city service at a “turn up and go” frequency (10minute service). Again from a public transport perspective option D was the first preference, with option C running a close second. Of the options in the regulation 25 consultations, Options 1 and 2 give the broad northeast, southwest distribution pattern favoured. Option 1 is most favoured; this option concentrates development in the smallest number of locations and thus offers the best opportunities for developing a strong market for public transport services.

Specific public transport requirements by potential growth sector

Common issues for all three Joint Core Strategy Growth Options

### **Key Issues – NE Sector**

NE Growth to Salhouse station

Opportunity to link growth to rail network at Salhouse station, or by relocating this station closer to the growth. Currently little capacity for growth in the rail network – removing constraints would require considerable investment.

NE Growth to Broadland Business Park

NDR and Postwick Hub will have considerable impact on traffic flows, which will in turn impact on Public Transport. Priority public transport access will be needed to ensure an effective route between the employment and the housing growth.

Radial routes into and out of the City Centre

Consideration needs to be given as to whether the public transport connections are aimed at linking the growth area to the city centre or play a role in enhancing public transport for existing communities. (A route through Salhouse Rd and Gurney road across Mousehold Heath could bring environmental concerns and also involves a route with no housing or trip attraction)

### **Key Issues – West Sector**

West growth areas exit routes

The recent development is already causing problems. Bus only exit will allow faster journeys to city centre. Dereham Road corridor already congested, this will increase with additional housing.

Cross-city link to western growth area

No obvious cross-city link, new link would duplicate current commercial routes. May be better operated as link only from the growth area to the city centre.

## **Key Issues - Wymondham**

Wymondham rail services

Current service suffers from reliability and capacity issues; existing infrastructure unlikely to cope with extra demand created by growth. Further detailed work required

Wymondham growth area exit routes

Lack of detail on the growth area means difficult to evaluate. Can assume that exit routes will become congested and a range of public transport priority measures will be essential to ensure punctuality.

## **Key Issues – City Centre and Approaches**

Narrow roads into the city centre considerably limits the opportunity for public transport priority measures.

Capacity issues in the city centre

Current transport levels are unlikely to offer much spare capacity in the transport infrastructure. To serve the growth areas there needs to be a substantial increase in bus stops and bus station capacity.

## **Joint Core Strategy Options one and two**

### **Key Issues – South West Sector**

Potential corridors (Hethersett Lane/Earlham Rd and Newmarket Rd) suffer congestion and high levels of journey time variability.

Bus only link between N&N University Hospital and UEA

Bus only link could improve public transport links to the hospital, UEA and the wider city. Impact on the environment is a major concern. May need to consider zero emission vehicles to help mitigate negative perceptions.

Poor quality access to Hethersett

Currently requires crossing the A47 and travel along route unsuitable for large vehicles and route would need to be upgraded. Alternate route could utilise Thickthorn interchange. This interchange is congested, especially at peak times. A range of priority measures would be required to enable reliable journey times.

Hethersett growth areas exit routes.

Lack of detail on the growth area means difficult to evaluate. Can assume that exit routes will become congested and a range of public transport priority measures will be essential to ensure punctuality.

## **Joint Core Strategy Option three**

### **Key Issues – Long Stratton**

Development may be too small to achieve an increase in public transport mode share.

Developer contributions to bypass likely to reduce potential funding for high quality public transport connection to Norwich. From a public transport point of view Long Stratton works better in conjunction with development at Mangreen, especially employment development, which could help reduce commuting into the city centre.



There are many constraints to the development of a public transport corridor on the A140

Option 3 would require expansion of the Harford Park and Ride site or a new site at Trowse to take up the demand arising from A146/B1332

**Development in the South v Development in the South West**

Two public transport priority routes, via Thickthorn or via Hethersett Lane, can cater for development in the southwest

There are no existing bus priority measures on the A140 corridor that could provide a base for development of a public transport priority route.

Development in the southwest offers greater potential to develop direct bus links to strategic employment sites, including Gateway 11, Longwater and NRP. Additionally development in the southwest would work well in conjunction with Wymondham in providing a “turn up and go” cross-city service on a southwest northeast axis.

## **Norwich Sub Region: Retail and Town Centre Study**

The study modelled the total potential growth for its assessment of future retail capacity and needs. It also modelled the potential need for new convenience and comparison goods floorspace to serve the different residential growth options. This evaluation was based on the options in the Issues and Options consultation. No detailed recommendation was set out, this is because the study is a “high level” analysis and it is considered inappropriate to identify an appropriate scale, mix or type of retail uses and floorspace to serve the residential growth areas. In addition the study comments that many the growth locations will be, in part at least, served by existing centres. In some cases the growth can help underpin the overall viability and vitality of existing centres.

The study concludes:

“..we also recognise that to create sustainable communities, there is an option for new shopping, leisure, health, community and other facilities to serve the residential allocations identified. The options for circa 8,000 – 10,000 new homes could, we consider, support a foodstore of circa 1000 – 1,500 sqm net. This would in turn underpin the commercial viability of other uses as part of a wider development. As a minimum requirement we consider that a range of additional shops, services and activities would be required to meet the day-to-day needs of the local residential population and help promote “sustainable communities”. The could include, for example, newsagents, dry cleaners, banks/financial services, A3/A4/A5 uses, hairdressers, dry cleaners/laundrettes, pharmacies and other convenience retailers, such as bakers and butchers. At this stage we do not, however, consider that the new residential allocations could or should accommodate larger non-food shops, as this could have a detrimental impact on neighbourhood centres.”

## Water Cycle Study

Stage 2 examined the eleven individual growth locations specified in the Issues and Options paper and made recommendations on which are the most appropriate locations (from a water management perspective) for growth. The study ranked locations using a scoring matrix that gave the highest points to the sites that required the least amount of investment and best in terms of flood risk and environmental considerations. Three scenarios were evaluated

- Scored on the basis that waste water would go to the Whitlingham Waste Water Treatment Works (WWTW)
- Scored on the basis that waste water would be accommodated at existing WWTW, which would require the existing headroom to be maximised and then upgraded
- Scored on the basis of waste water being accommodated in new WWTW

Common element – the growth for Norwich City is common to all options as are the works required (flow to be accommodated at the Whitlingham WWTW)

- Scored on the basis that waste water would go to the Whitlingham Waste Water Treatment Works (WWTW)

### Overall findings

- because flood risk and environmental factors are common throughout on this option the relative scores between the locations are predominantly influenced by cost.
- Overall cost between locations is marginal, except for Wymondham and Long Stratton, which are situated significantly further from Whitlingham WWTW and Heigham water treatment works(WTW)
- Proximity of South West Sector, North West Sector and West Sector to Heigham WTW means that water supply costs and water resources costs lower overall cost of infrastructure
- Proximity of North East Sector to Whitlingham WWTW and Heigham WTW leads to a reduction in infrastructure costs
- Scored on the basis that waste water would be accommodated at existing WWTW, which would require the existing headroom to be maximised and then upgraded
  - Cost of providing infrastructure is reasonably similar, except for Long Stratton which has an excessively high connection cost to Thorpe St Andrew and Colney bore holes. Assumed water is piped from boreholes to Heigham WTW and then back again. East Sector which is relatively far away from Rackheath WWTW
  - Overall costs are £15 million more than using Whitlingham, although this needs verifying as the cost of upgrading Whitlingham will be similar to the cost of a new WWTW
- Scored on the basis of waste water being accommodated in new WWTW
  - Costs of providing a new WWTW have been standardised throughout so scoring is based on the cost of water supply and water resources as well as the flood risk and environmental factors

- Infrastructure cost for providing pipelines from the boreholes to Heigham WTW and onto Long Stratton make this the most expensive option
- The distance from Heigham WTW to Long Stratton and Wymondham increase costs for water resources

The study ranked the 12 growth locations based on a ranking combining the options of waste water being treated at existing WWTW and Whitlingham. The option for a new WWTW was not included because building a new WWTW before utilising existing capacity would not be favourable from the study's point of view.

This combined ranking for the JCS growth locations shows:

Location	Rank (from the 11 locations)
South West Sector (A11 B1108)	1 <sup>st</sup>
West Sector (River Yare to River Wensum)	2 <sup>nd</sup>
North East Sector (inside NDR)	3 <sup>rd</sup>
South Sector (A11 – A140 outside A47)	6 <sup>th</sup>
Wymondham	8 <sup>th</sup>
North East Sector (outside NDR)	9 <sup>th</sup>
Long Stratton	11 <sup>th</sup>

## Greater Norwich Employment Growth and Sites & Premises Study

This study examined the potential for economic growth in the Norwich area economy. It also reviewed the current and future supply of employment land and premises for the RSS period (2001 – 2021).

Three forecasts were analysed:

- Baseline scenario – population and economic growth forecast without taking account possible constraints on house-building or infrastructure development. Assumes an expansion of 64,000 extra people with the creation of 44,000 net extra jobs.
- RSS Dwellings scenario – assumes RSS housing targets are met but no additional growth accommodated. Population grows by 50,000 and 40,000 net extra jobs.
- Low growth scenario – assumes significant job losses in the financial sector, faster rate of decline in manufacturing, lower job creation in the public sector and overall loss in tradable services due to the decline of other sectors. Population growth of 50,000, net extra jobs 19,000.

The report suggests that a key focus for policy should be to help create a more balanced labour market by supporting development of jobs and sectors that require a more highly skilled workforce. This will help to address some of the deprivation issues within greater Norwich and contribute to the emergence of a more pronounced “knowledge economy”.

The report identifies the following key areas for the provision of land and premises:

Key areas for action in the Norwich Area are listed as:

- there have been shortfalls in the range and variety of industrial land and premises and these need to be addressed:
- Smaller firms have expressed problems with finding appropriate premises, particularly manufacturing businesses. There is also some evidence of limited opportunities for owner-occupation.
- There is a need to retain a range of industrial estates and other employment sites within Norwich for business use and to protect them against pressures towards conversion to residential use.
- There is a corresponding need to ensure that the economic vitality of rural areas and market towns is supported through suitable provision of employment land.
- Norwich, like several other cities needs to address the tension of developing office space within the city and on the city fringes (such as further development of the Broadland Business Park), which may lead to a loss of employment within the city itself.
- There is therefore a need to retain different types of employment in and around the city centre as part of the overall attraction of the city, and counter-act trends towards ‘hollowing out’ of the city with employment moving to the urban fringe.

Key action for rural areas includes ensuring that the basis for undertaking existing business activities remains in place, in particular, provision of appropriate land and property. This includes making available sufficient employment land at existing industrial

estates in each of the market towns, as well as for conversion of agricultural buildings for expanding niches of economic activity.

### **Policy context**

- Using the RSS policy as its basis the study recommends that planning for employment growth in the NPA should focus on:
- the City Centre, particularly media and creative industries, finance and insurance, and information communication technologies;
- Thorpe St Andrew and Longwater, Costessey (business park use);
- Colney/Cringleford (significant expansion of the research park reserved for research and development, higher education, and hospital/health related uses);
- Norwich Airport (uses benefiting from an airport-related location); and
- Wymondham/A11 corridor (high-tech development and rail-related uses).
- New requirements for transport infrastructure arising from development in the Norwich area
- Existing and emerging economic clusters/ sectors to be supported and promoted include media and creative industries, business and professional services, finance and insurance, energy (including renewable energy), advanced engineering (including high performance motor sport), environmental economy, health and life sciences including plant biotechnology, education, and tourism.

### **Land and Premises**

In relation to offices the overall floorspace requirement is estimated to be in the region of 300,000 sq m. The study recommends this be distributed as follows:

- Norwich City Centre and the wider central area 100,000 sq m
- Norwich Research Park 100,000 sq m, based on a floorspace plot ratio of about 1:4.
- Broadland Business Park 50,000 sq m
- For the remaining 50,000 sq m, the study suggests there are a number of options including:
- Further space in the city centre and/or
- New allocations of business parks associated with housing allocations.
- Greater use of Longwater as an office par

### **Gaps in supply**

In addition to quantitative requirements the study recommends that there should be greater provision specifically targeted at smaller and start up businesses. The characteristics of this provision would include:

- Flexible ownership arrangements including opportunities for owner occupation and owner developments through to short and flexible tenancies
- Opportunities for shared services e.g. IT, reprographics, meeting rooms etc
- Access to finance
- Access to business support and professional services
- Attractive environment

The study's recommendation addresses this by a combination of the rural sites and market towns (playing to the strengths of their environments) together with the provision of new business centre space adjacent to Norwich City Centre, possibly in locations such as Anglia Square, the City Trading Estate and Heigham Street etc.

In respect to delivery of a Research Park, the study accepted the existing allocation and contingency area in the South Norfolk Local Plan, it suggested that a highly proactive approach is needed to ensure its delivery. This is because there are ownership issues to be resolved which the study concludes will not be achieved without strong measures, including possible use of CPOs. In view of its national and regional significance, and the scale of potential the Park should also be a priority for public resources. In addition, as the forecasts have suggested, growth is likely to involve substantial growth in research and development as part of the broad business services category.

There are consistent themes in the study relating to addressing geographic needs. These include the need to ensure that the communities of Norwich are able to engage and benefit from future employment growth. Norwich has surprisingly high levels of deprivation spread throughout the urban area, but our conclusion is that residents in the north city have been facing an increasing decline in employment opportunities. Therefore, there is a need to strongly promote the development of new opportunities in the north and the study identified the Airport as the strongest driver for this growth.

## **A47 Southern Bypass Junctions Capacity Assessment Report**

Mott MacDonald as Norfolk County Council's Strategic Partner have carried out an initial capacity assessment of three of the A47 Norwich southern bypass junctions. The assessment was based on the traffic data extracted from the existing NATS SATURN model tests for the Northern Distributor Road with JCS development at years 2012 and 2027. It includes impacts on the junctions, identification of potential mitigation measures and high level cost estimates. The existing modelling for the NDR on which this assessment is based incorporates a distribution of dwellings that is similar to JCS Option 1.

The three junctions included in this study are:

- Junction 1 - A47/B1108 (Watton Road) roundabouts
- Junction 2 - A47/A11 (Thickthorn) roundabout
- Junction 3 - A47/A140 (Harford) roundabout
- 

The results of this assessment are as follows:

- Although the JCS development would increase the traffic flows at B1108 Watton Road roundabouts, delays are expected to be minimal by 2027 and queue lengths are minimum or no queues for 2027. Therefore, no mitigation measures are currently deemed necessary;
- A11 Thickthorn roundabout would have significant delays and queues due to the JCS development. A low cost option for improving capacity has an indicative cost of around £150,000 while significant improvement has an indicative cost of around £40 million (costs include optimism bias)
- A140 Harford roundabout would also be significantly affected by the JCS development traffic. Partial signalisation option and roundabout alterations will need to be considered. The capital cost of these options, including optimism bias, is estimated as £180 000 to £1.2 million. More significant growth on the A140 corridor south of Norwich would require a junction improvement costing up to around £40 million, as a solution as radical as proposed at A11 Thickthorn roundabout may be required.

The overall capital cost including optimism bias, with exclusions as set out in the report, is estimated as £330 000 to £81 million.

If GNDP wish to consider the impact of the JCS development on the A47 junctions further then surveys and more detailed modelling are required.



## **Green Infrastructure Strategy**

The Strategy looks to create a bold vision for the Greater Norwich Area and establish a strategy that will complement and support good quality housing and employment growth by;

- Providing a high quality, accessible green infrastructure within a comprehensive landscape structure
- Promoting ecological networks and continuity and links between habitats
- Improving quality of life
- Helping to address climate change
- Improving access to habitats and green space, and
- Encouraging community well being

All options have the potential to play a role in implementing this strategy

## **Strategic Flood Risk Assessment**

Three Strategic Flood Risk Assessments, (SFRA), give coverage of the whole of the GNDP area as required by Planning Policy Statement 25 (PPS 25) “*Development and Flood Risk*” (published 2006). The PPS requires the preparation of SFRAs to inform the preparation of local development documents and enable local planning authorities to apply the sequential approach to site selection. This sequential approach requires local planning authorities to avoid, where possible, allocating land for development where there is an unacceptable risk from flooding.

The SFRAs:

- Provide a reference and policy document that informs the Joint Core Strategy,
- Ensure that the GNDP meets its obligations set out in PPS 25, and
- Provides a reference for private and commercial developers

All options in the Regulation 25 document conform to PPS 25 when assessed against the SFRAs.

## **Draft report on Cultural Heritage.**

### **Background**

The draft report has been produced in response to a meeting with the Principal Planner regarding proposed areas for development under the GNGP. It is written in the context of the RRS review which acknowledges the importance of the wider historic landscape, much of which does not carry formal designation. The report sets out a preliminary assessment of the cultural heritage potential of the sites being considered for development, which should be considered alongside other information marked on the constraints map.

### **Content of the report**

The sites examined are based on rough indications of the areas under consideration. These areas are marked on maps at the end of the report. The report has been entirely desk-based, and so does not include information on buildings of local historic interest, or more detailed results on archaeological potential which would result from field study.

The report includes information on listed buildings and conservation areas, though these are marked on the constraints map, firstly, because conservation areas do not show up clearly on the map, and secondly to supply information on Grades; Grade I and II\* buildings having higher status and standards for protection than Grade II buildings.

### **Conclusions**

From a cultural heritage point of view, this preliminary study indicates that the sites which would be least damaged by proposed development are:

- Hethersett: Area 3: west of A47
- Wymondham Area 2: Silfield Road, subject to the Deer Park boundary being preserved
- Colney
- Easton
- Cringleford, subject to archaeological evaluation to determine the exact nature, extent and survival of deposits
- Long Stratton: Area 2: Forncett Road
- Long Stratton: Area 3: south of Flowerpot Lane
- North-east Norwich Area 3: Sprowston Manor Park area
- North-east Norwich Area 5: Thorpe End south of Salhouse Road

The study also identifies some sites where the potential for further Historic Landscape significance is suggested by the desk-based study. Further detailed research should be completed on the following sites in order to inform decisions:

- Wymondham Area 1: Gonville Hall
- Wymondham Area 3: Downham
- Mulbarton
- Swardeston
- Long Stratton Area 1: East of Long Stratton

Response from GO-East

**GO-East**GOVERNMENT OFFICE  
FOR THE EAST OF ENGLAND

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Our ref E1/F2605/15/02/01 PT2

30 September 2008

Dear Sandra

**PLANNING AND COMPULSORY PURCHASE ACT 2004**  
**JOINT CORE STRATEGY FOR BROADLAND, NORWICH AND SOUTH**  
**NORFOLK – REG 25 ISSUES AND OPTIONS REPORT**

1. Thank you for inviting us to comment on the Joint Core Strategy Issues and Options document, and please accept my apologies for the late submission of this response.
2. You will recall that Richard Kay made comments to you on 21 January 2008 in response to an earlier Issues and Options consultation, under the 2004 Regulations. We understand that the Greater Norwich Partnership has now decided to take a ‘step back’ in the preparation of its Joint Core Strategy in order to test further options for growth in South Norfolk.
3. We are responding to the Issues and Options document on the basis that it is part of the pre-submission consultation with the community and stakeholders for the Joint Core Strategy being undertaken to comply with Regulation 25 of the Town & Country Planning (Local Development) (England) (Amendment) Regulations 2008.

**The Government Office’s Role**

4. Our role in DPD preparation is to help ensure that submitted documents are legally compliant and ‘sound’ in relation to the tests set out in paragraphs 4.50 - 4.52 of Planning Policy Statement 12 (PPS12) – *Local Spatial Planning*. During the pre-submission production stages, our focus is to seek to identify any serious omissions and obvious errors in relation to the advice set out in Planning Policy Statement 12 (PPS12): *Local Development Frameworks*, rather than provide a full and detailed assessment of the report, as we recognise that some elements of your Core Strategy may still need to be formulated, refined and tested through ongoing engagement with the local community and stakeholders and through the sustainability appraisal process.

5. We have not considered the acceptability or otherwise of individual sites in the context of national policy at this stage as this should form part of the ongoing testing of options and alternatives carried out by the authority. Rather, we have looked at the issues and options document with a view to assessing whether matters relevant to the testing of options have been recognised, and there is proper recognition of linkages between policies and spatial planning objectives. In this context, we welcome the identification of key infrastructure requirements, but have not considered the merits of individual schemes listed under key dependencies.

### **Going Forward under a revised PPS12**

6. The recently published revisions to the Regulations, along with revised PPS12, are mainly aimed at streamlining the process so that the production of DPD's happens as quickly as possible, whilst ensuring that public participation is effective, and the results fully taken into account. The revisions provide local planning authorities with greater freedom to determine the most appropriate way to prepare or revise DPD's. In particular, they remove one of the formal stages of consultation – the Preferred Option stage - and now require that representations are made on a DPD before submission to the Secretary of State.
7. You should refer to the new PPS in taking forward this DPD, and in particular to the principles with which all DPDs should comply, listed at Section 5:
  - Participation and stakeholders (see section 4.20, 4.25 & 4.27);
  - Not repeating national and regional policy (4.30);
  - Being subject to a sustainability appraisal (4.39 – 4.42);
  - Being justified, effective and consistent with national policy (4.36 & 4.44) and Being produced according to the timetable set out in the LDS to ensure that the DPD is produced in a timely and efficient manner (see section 4.53 & 4.54).
8. We are aware of the work you are undertaking to ensure compliance with these principles and will be keen to understand whether, given the flexibility provided for under the revised Regulations, you intend to drop the Preferred Options stage, or whether the authority intends to prepare further consultation material prior to consulting on the submission document under Regulation 27.
9. Whilst the revised Regulations allow that the approach to future stages in the process should be appropriate and proportionate to the level of decision making and the scale of issues involved, emphasis on frontloading remains, and the pre-submission publication stage should not strictly be viewed as part of the consultation process.
10. You will be aware that, where the Partnership intends to do something different from what is set out in the Statement of Community Involvement, it will need to consider what expectations the extant SCI has raised in terms of consultation with the community. It will be important to ensure that even if the letter of the SCI cannot sensibly be adhered to due to changes to the Regulations, the intentions and principles of effective and appropriate community involvement throughout the plan preparation are met.
11. Further guidance, including examples of best practice, is provided in the Plan Making Manual, which may be accessed via the Planning Advisory Service's website: [www.pas.gov.uk/planmakingmanual](http://www.pas.gov.uk/planmakingmanual). This includes guidance on whether, as a result of recent

amendments to the regulations, local authorities need to revise their SCI. This advice articulates the preference of Government for any necessary SCI revisions to take place after the requirement for the independent examination of SCIs is repealed by the Planning Bill (Royal Assent expected by the end of the year at the earliest) and the view that SCIs should not be revised simply because new Regulations have been issued.

12. We would also draw your attention to the value of undertaking a self-assessment of the soundness of the DPD as you prepare and finalise the submission version, and of making this available when you formally submit these documents. This has been recommended by the Planning Inspectorate as a good way for local authorities to undertake an audit of how submission DPDs meet each of the soundness criteria against which they will be tested and so aid consultees, the Inspector and the overall examination process. We also draw your attention to the recent publication by the Planning Inspectorate entitled 'LDFs: Lessons Learnt Examining Development Plan Documents' which can be found at <http://www.pas.gov.uk/pas/aio/41411>. This sets out useful generic advice which could assist you as you progress to submission.

### **General Comments**

13. Overall, we consider that the consultation document is clear, well-structured and broadly consistent with the requirements of the Revised Regulations. We commend you for the work carried out so far.

### **Delivery Framework, implementation and monitoring**

14. We expect the submission DPD to include a 'delivery, implementation and monitoring framework' setting out how and when and by whom the Core Strategy's vision, objectives, spatial strategy and policies will be delivered.

### **Replacing Saved Policies**

15. It is a regulatory requirement (Regulation 13(5)) for the Authority to identify which extant saved local plan policies will be replaced/superseded by the DPD upon its adoption. We would suggest that the Preferred Options document (if retained) should give a broad indication of the extant policy areas likely to be replaced and that the submission document includes this information in detail, perhaps as an appendix.

### **Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)**

16. I note the reference to the requirements for Sustainability Appraisal at para 3.6 of the Issues and Options report, and would remind you that at submission, the Partnership will need to demonstrate that the plan is the most appropriate when considered against reasonable alternatives. Current guidance (Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks) provides information relating to the process of integrating Sustainability Appraisal, incorporating Strategic Environmental Assessment (SEA), with DPD production. There will be an expectation that when the Core Strategy is submitted for examination, the Council is able to demonstrate that the Council's decisions for deciding on certain options and ruling out others has been underpinned and informed by a robust Sustainability Appraisal (SA). We suggest that the Authority should consider, in submitting the final DPD, creating a clear 'audit' trail between the SA report and the spatial strategy for the District.

## **Habitats Directive**

17. Similarly, I note the reference to Appropriate Assessment at para 3.6, and would take this opportunity to remind you that, in relation to potential direct or indirect impacts on adjacent Natura 2000 sites, the Authority will need to be satisfied that at submission, the draft Plan will not adversely affect the integrity of any site designated under the Habitats Directive.

## **Gypsy and Travellers Sites**

18. In relation to gypsy and traveller sites, we welcome the inclusion of proposed provision for gypsy and traveller pitches in Norwich, Broadland and South Norfolk.

## **Consultation Statement**

19. Finally, may I remind you that when you submit your DPD, you will be required to provide a statement setting out which bodies were consulted at earlier regulated stages, how they were consulted, and a summary of the main issues raised and how these have been addressed. It is important therefore that you document clearly the consultation that you are undertaking now, and in the future, to inform this requirement.

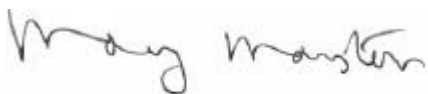
20. I am aware that you have also consulted on the draft methodology for your SHLAA in parallel with your Core Strategy consultation. I have not had the opportunity to scrutinise this in detail, but am pleased to note your proposed approach is broadly in line with the published guidance. We therefore have no comments to make at this stage.

## **Conclusion**

21. I trust these comments are useful, and am of course happy to discuss any points or issues we raise in this letter informally with you, and to assist you in the next stages of your document. In particular, it will be important to resolve any potential concerns about soundness and related matters, including the consultation and appraisal process, prior to the DPD's submission and subsequent examination.

22. We look forward to working with you to take forward this DPD towards adoption.

Yours sincerely



**MARY MARSTON**  
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**Joint Core Strategy for Broadland, Norwich and South Norfolk  
Potential risks associated with failure to agree a preferred/favoured option  
for the Joint Core Strategy**

This document explains the key risks associated with failure to agree a 'favoured' option for the Joint Core Strategy. Members are asked to consider these risks in making their decisions to move forward.

**1. Introduction**

- 1.1 This paper sets out the potential risks for the Greater Norwich Partnership relating to non-agreement of a 'favoured option' as the next stage of the Joint Core Strategy process.
- Intervention by Secretary of State in preparation of plan
  - Loss of credibility leads to reduction in various funding streams
    - Growth Point funding
    - Related streams, for example CIF with risk to Postwick hub
    - RIF with the risk to Long Stratton bypass
    - RFA with a risk to Norwich Northern Distributor Road and public transport bid
    - HCA support for affordable housing could be compromised
    - EEDA support for economic initiatives might be compromised if housing delivery is threatened
    - Eco town funding for Rackheath could be threatened
    - Use of surplus housing pot for infrastructure would be compromised – likely to be reallocated to other areas
    - Loss of HPDG
  - Failure to deliver housing likely to result in appeal led planning
    - Cost of inquiries
    - Costs are awarded against local planning authorities
    - Minimum infrastructure secured
    - Developments in areas of developers choosing, not local planning authorities'
  - Potential for local planning authorities in Greater Norwich to object to each other's core strategies
  - Failure to deliver housing likely to result in more local housing stress and pressure on local housing authorities
  - County council no longer "locked in" to the partnership with risk of objection to core strategies and reduced commitment as a service provider



- Eco community threatened through loss of credibility and inadequate emerging policy framework
- Would need to revert to individual district targets as set out in East of England Plan, unless a formal agreement was established – by common consent not the best distribution
- Would weaken the supporting case for the Norwich Northern Distributor Road planning application. This rests in part on the role of the road in creating the conditions where public transport priorities can be created to enable large scale development in the north east.
- The NNDR is also in part dependent on a degree of developer funding, which cannot come forward in the absence of development in the context of the core strategy. Any delay in the JCS could as a minimum delay the availability of such funds
- There would be a loss of community confidence in the GNDP, and the credibility of its other activities could suffer as a consequence
- The delay would have knock on effects on studies currently waiting for the starting pistol
  - CIL/developer contributions study ( EDAW)
  - Water cycle study stage 2b
  - Southern bypass junction studies

## **2. Action required**

### **2.1 Members are asked**

- to note these risks when considering the way forward in agreeing a single favoured option for the Joint Core Strategy based on the evidence gathered in order to go forward for full public consultation and further technical work in preparation for the submission stage.

10th December 2008