

Report for Resolution

Report to Local Development Framework Working Party,
23 November 2009
Executive 25 November 2009

Report of Head of Planning Services

Subject Response to the East of England Plan 2031 Consultation

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Purpose

To consider the Council's response to the consultation being conducted by the East of England Regional Assembly on rolling forward the East of England Plan to cover the period to 2031.

Recommendations

That this report and the GNDP response to the consultation in Appendix 2 be noted and Appendix 1 be endorsed as the response of the City Council to the Consultation.

Financial Consequences

The financial consequences of this report are none.

Risk Assessment

No risks have been identified.

Strategic Priority and Outcome/Service Priorities

The report helps to meet the strategic priority "Strong and prosperous city – working to improve quality of life for residents, visitors and those who work in the city now and in the future"

Executive Member: Councillor Morrey - Sustainable City Development

Ward: All

Contact Officers

Graham Nelson, Head of Planning Services

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Background Documents

Consultation document on the RSS Review: "East of England Plan >2031 – Scenarios for housing and economic growth" Consultation September 2009. East of England Regional Assembly

[Home Page - East of England Plan - East of England Plan > 2031 Scenarios for housing and economic growth](#)

EERA Greater Norwich Sub-Area Economic Profile. EERA 2009

<http://www.eera.gov.uk/GetAsset.aspx?id=fAAzADIANQA2AHwAfABGAGEAbABzAGUAFAB8ADAAfAA1>

Current East of England Plan. GO-East May 2008
[Government Offices | East of England |](#)

Report

Background

1. The East of England Regional Assembly (EERA) is reviewing the East of England Plan (also known as the Regional Spatial Strategy or RSS). The current RSS was published in May 2008 and provides the strategic framework to guide the planning activities of local planning authorities. Among other things it sets minimum housing targets with local authorities must seek to deliver. The end date of the current plan is 2021 and the review seeks to extend the end date of the RSS until 2031. The revised plan is proposed to cover the period 2011-2031.
2. This is the second stage in the preparation of the review. Previously EERA had requested the advice of Norfolk County Council (as the relevant Sec 4(4) and 5(5) authority under the Planning and Compulsory Purchase Act 2004) on four growth scenarios and their implications for planning policies. The County Council provided this advice in January 2009 and this was endorsed by Executive Committee at its meeting on 21st January 2009.
3. This concluded that the area of the GNDP is capable of providing for a continuation of RSS residual rates (710 dwellings per annum (dpa) in Norwich, 2000 dpa in GNDP) and is also capable of providing for further additional growth of up to or around 2,000 dwellings to allow RSS residual rates to continue across Norfolk as a whole (this would increase rates across the GNDP to 2,100dpa to allow delivery of 4,160 dpa across Norfolk). However, the response stressed the need for infrastructure investment in order to be able to deliver this level of growth.
4. The timetable for the preparation of the draft revision is very ambitious. Following the close of consultation on 24th November and the deadline for response on policy NR1 on 9th December, there will be limited opportunity to consider the responses and prepare papers for a regional workshop on 21st January. Following the workshop the draft revision to the RSS will be prepared for consideration at Regional Planning Panel on 26th February (there may be limited opportunity for the local authorities to input further into and consequential changes to policy NR1 arising from the workshop. After the Planning Panel on 26th February the draft revision will be considered by the Regional Assembly on 12th March 2010 before formal submission to the government before the end of March 2010 (and the formal winding up of EERA).

Content of the Current Consultation

5. The current consultation runs until 24th November (although provision exists for authorities to respond later provided draft reports are received prior to 24th Nov). The consultation documentation describes 4 possible scenarios for growth over the period 2011-2031. It should be noted that these scenarios have changed both locally and regionally from those consulted on previously and the 4 revised scenarios all lie towards the lower end of the figures previously tested for Norwich (previously the figures ranged between 710-1146

dpa for Norwich).

6. In summary the four scenarios being consulted on this time are:

Scenario 1 - 26,060 new homes p/a in the region– continuation of existing target and broadly based on the views of local councils in the region.

Number of homes per annum 2011-2031

Norwich	720	GNDP	2160	Norfolk	4150
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This is above current RSS rates for both Norwich and the GNDP and marginally higher than the level which the Council previous indicated that it may be able to provide (which equates to approx 2100 dpa across the GNDP). The reason for this slight increase is a proposed under provision in other areas of Norfolk compared to the residual RSS rate which has been factored back into the figures across all areas of Norfolk.

It should be noted that notwithstanding the marginally increased level proposed under this scenario this level of development is likely to be able to be delivered under the current locational strategy rolled forward provided necessary infrastructure investment (this is due to a the degree of over allocation in the current JCS compared with targets).

• **Scenario 2 - 30,100 new homes p/a** – promotes growth in areas identified by the Regional Scale Settlement Study published in January 2009. Chelmsford would grow to be a regional city, three medium-sized new settlements of up to 20,000 homes located in Central Bedfordshire, Huntingdonshire and either Uttlesford or Braintree – and smaller increases in Peterborough, Suffolk and the rest of Essex.

Number of homes per annum 2011-2031

Norwich	720	GNDP	2160	Norfolk	4150
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This does not alter the growth levels for Norfolk or Norwich. Members should note that even though Norwich is identified in the Regional Scale Settlement Study as having potential for significant growth over the long term, EERA have taken the view that as build rates are already high it is questionable whether any further increased rates could be delivered so have not identified further growth for Norwich under this scenario.

• **Scenario 3 – 29,970 new homes p/a** – promotes growth around successful business locations where new jobs are attracting workers. Additional growth is spread over many districts but with a particular focus on Hertfordshire, south Essex and Cambridgeshire.

Number of homes per annum 2011-2031

Norwich	720	GNDP	2310	Norfolk	4290
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Scenario 3 is informed particularly by the use of a economic forecasting model (the East of England Forecasting Model (EEFM) developed by Oxford Economics). This models projects increases in Broadland and South Norfolk which reflect their potential for economic growth. Although the economic projections show that about

3,900 fewer dwellings would be needed in Norwich, the housing growth is held at the scenario 1 level as it is assumed interventions would be made to raise economic performance.

Officers have particular concerns about the validity and reliability of this model in relation to its use for being able to plan for housing growth at a district level. As with all forecasting models the EEFM forecasts are speculative and based on past trends only. The model makes the broad assumption that commuting flows over the forecast period are in line with past trends. The model adjusts commuting in the scenarios in line with the commuting patterns identified in the 2001 Census. Oxford Economics suggest that the commuting forecasts are crude and that more sophisticated links could be incorporated into the EEFM in the future if required.

If the model were used at the GNDP rather than District level it would appear to support a level of growth similar to the 2100 dpa across the GNDP mentioned in the previous response.

• **Scenario 4 – 33,650 new homes p/a** – promotes growth where households are projected to grow. It is based on long-term trends such as people living longer and people moving to the region. It focuses the majority of additional growth in Hertfordshire, Essex, Norfolk and Suffolk.

Number of homes per annum 2011-2031

Norwich	850	GNDP	2400	Norfolk	5650
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Scenario 4 is based on the continuation of past migration trends. Evidence available from JCS work, infrastructure analysis and economic forecasting would suggest these levels would be difficult to sustain across Norwich and the GNDP.

7. In addition to the 4 scenarios the EERA consultation is actually quite wide ranging. It also touches on whether the vision in the current East of England Plan remains appropriate, which policies in the Plan should be up for review (and at least 25 policies plus all the sub-area policies are listed as being for review), and questions are asked on sub-area profiles and the Sustainability Appraisal.

Suggested Response

8. In accordance with the processes that have been used at previous stages of the RSS review it has been considered that there is merit in seeking to agree a common approach to the response insofar as is possible with partner authorities in the Greater Norwich Development Partnership (GNDP).
9. An emerging draft GNDP response has been prepared and is attached at Appendix 2. At the time of writing this response has yet to be agreed. However, it is expected that a joint response will be signed off by the Leaders and agreed by the GNDP prior to the consideration of this report. If this is the case the final agreed GNDP response will be circulated.
10. The GNDP response focuses on the growth scenarios and potential changes for current East of England Plan policy NR1 for the Norwich Policy Area. It does not seek to address all of the points raised in the EERA consultation. In the light of this an additional response is proposed on behalf of the City Council

which is attached at Appendix 1. The response addresses particularly consultation questions 5 – 8 which are not addressed in the GNDP response.

Appendix 1 – Suggested Norwich City Council Response

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Norwich NR2 1NH

East of England Plan Review
East of England Regional Assembly
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Flempton
Bury St Edmunds
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November 2009

Dear Sir/Madam,

Response of Norwich City Council to East of England Plan Consultation

Thank you for consulting Norwich City on the above. This response was endorsed by the Council's Executive Committee on 25th November.

Norwich City Council is a member of the Greater Norwich Development Partnership (GNDP) which works to deliver development in a planned and responsible way across Greater Norwich. The GNDP has responded separately to the consultation on the East of England Plan Review and these comments are endorsed by the City Council.

The GNDP response focuses on the growth scenarios and potential changes for current East of England Plan policy NR1 for the Norwich Policy Area. It does not seek to address all of the points raised in the EERA consultation.

This response does not seek to repeat the comments made by the GNDP in relation to questions 1-4 of your consultation. However, it does seek to make some general points about the review process and particularly its timing and also makes some comment on your consultation questions 5 – 8. Therefore, this letter should be read in conjunction with the GNDP response.

General Comments on Process

Norwich City Council is aware of the requirement on the Regional Assembly contained in East of England Plan policy IMP3 to conduct this review. It is supportive of the regional planning process and sees merit in having an up to date and long term Regional Spatial Strategy to set the framework for the development of the Greater Norwich Area. However, it regards the timing of the review as unhelpful and urges reconsideration of this.

The current East of England Plan (in para 13.68) acknowledges the scale of growth proposed for the Norwich Policy Area as being one of the two locations (the other being Cambridge) with the highest level of growth in the region. In view of the state of its economy, the level of environmental constraints and infrastructure deficit faced by Norwich it arguably faces the greatest challenge of any area of the region in delivering the growth targets set out in the current East of England Plan.

The Joint Core Strategy for Broadland, Norwich and South Norfolk was published for representations to be made on compliance and soundness issues (under reg 28(1)) on 2nd November and, assuming the local authorities deem it sound following consideration of representations, it will be submitted to the secretary of state in early 2010. Under current timetables it is proposed the East of England Plan review undergo its Examination in Public in advance of the Examination into the Joint Core Strategy.

To seek to plan at the strategic level for the period 2021-31 in advance of the detailed strategy for the intervening period for such a regionally important growth location being confirmed sound is a high risk strategy. Not only does this risk considerable confusion in the public mind, stretch the resources of the local authorities in contributing to the regional Plan review whilst bringing forward their own core strategy, it also means that a far greater level of uncertainty has to be faced in planning for growth after 2021.

In the circumstances Norwich City Council considers the risks associated with pressing ahead with the East of England Plan review to its current timetable to outweigh the benefits associated with getting a revised strategic plan in place by 2011. It therefore considers that the timetable for the review of the East of England Plan should be altered to allow for the Examination to take place following the publication of Inspectors reports into the soundness of core strategies considered key to the delivery of the current East of England Plan.

Responses of Questions 5-8

Norwich City Council considers the vision and objectives in the East of England Plan should have been the subject of more comprehensive review as part of this process. It considers the relatively short term nature of the vision to be problematic and that instead of specifying an end date it would be preferable if the vision looked beyond the timeframe of the RSS towards say the middle of the current century. At the very least the date of the vision in the reviewed Plan should refer to 2031 rather than 2021 but simply advancing the end date by 10 years and not changing the content of the vision or the objectives does reflect poorly on the ambition shown for the region.

Moreover it is considered that the vision and objectives in the East of England Plan should have been the subject of meaningful engagement with the people of the region. This is especially the case as the form of the vision and objectives in the current East of England Plan emerged relatively late in the process and were not subject to meaningful public engagement when they were first drafted. As a minimum it is suggested that there should have been some form of exercise checking the consistency of the vision and objectives with those of communities expressed through sustainable community strategies.

With regard to changes proposed to existing plan policies the list is noted but it is difficult to comment on whether individual policies should be subject to a review until there is a clear idea of the strategy they are attempting to implement. Clearly if scenario 4 is opted for then a rather greater range of policies will be need to be reviewed than if scenario 1 is chosen. The absence of a process which allows for formal consultation with the local planning authorities on the content of policies they are expected to implement in advance of their submission to the Secretary of State is also regrettable.

The review of sub-area policies is supported in the light of reconsideration of the overall strategy and Norwich City Council supports the comments of the GNDP on policy NR1. Additionally it is suggested that further emphasis should be given to the cultural development possibilities of the City. The cultural offer of the city centre in particular is crucial to its attractiveness to other industrial sectors and has the potential for significant economic benefit in its own right. Policy NR1 should provide a strong steer that culturally significant should be directed to the city centre in the first instance.

Building on the above point it is noted that policy C2 on the provision and location of strategic cultural facilities is not suggested for review. It is considered there would be merit in reviewing this policy with a regard to recognising that certain key centres of development and change (such as Norwich) are regionally significant in their offer of cultural facilities and that (as currently acknowledged in para 6.7) wherever possible new strategically important cultural facilities should be developed in or close to these centres.

On the sub-area profile for Greater Norwich, Norwich City Council would like to see the current and future importance of the City Centre as an employment centre recognised in paras 4.15-17. The scale of employment growth proposed in the City Centre is on a par on employment growth proposed in the other strategic sites listed and it is proposed to remain a considerable driving force behind the entire economy of the Greater Norwich area.

On a related matter the results of the East of England Local Economy Forecasting Model are noted. However, it is stressed that in the case of Greater Norwich because the functional economic area extends well beyond the City boundary this tool is regarded as entirely unsuitable for use in establishing future housing or employment targets at the City/District level.

Yours sincerely

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Director of Regeneration and Development

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13 November 2009

Dear Sir

East of England Plan > 2031 Scenarios for housing and economic growth

This response outlines the implications of proposed growth scenarios for the review of the East of England Plan. It suggests that previous advice on the maximum level of housing is still appropriate in principle but is dependent on infrastructure and jobs. Emerging evidence suggests that the ability to deliver necessary infrastructure may constrain the delivery of housing targets.

1. Introduction

- 1.1. The East of England Regional Assembly (EERA) is undertaking formal consultation on a roll forward of the East of England Plan (EEP). The consultation focuses on four scenarios for housing growth in the period 2011-2031 but recognises that the Vision and other policies may need to change or be developed. This report concentrates on the growth scenarios and potential changes that might result to the EEP Policy NR1 for the Norwich Policy Area. Partners may also wish to comment on individual policies.
- 1.2. The closing date for the consultation is the 24 November 2009. A draft plan will be the subject of further public consultation in the Spring of 2010. This will provide the opportunity for detailed responses to draft policies.
- 1.3. In December 2008 the GNDP Policy Group considered a report on early housing scenarios for the EEP review and concluded that *"subject to further work to understand the impact of the recession on the local economy and a clearer commitment to fund necessary infrastructure, 12,000 dwellings is the absolute maximum level of additional growth for the area in the period to 2031"*. This number of dwellings was based on a roll forward of the current

Jobs, homes, prosperity for local people

EEP rate of 2,000 dwellings per annum for the 5 years 2026-31 plus an additional 2,000 dwellings over the whole plan period. This advice from the GNDP was included in the County Council's statutory response. The report included an assessment of growth options which suggested that the additional growth could be accommodated broadly with 10,000 additional dwellings in the NPA and 2,000 outside the NPA. It should be noted that the number of new allocations needed to provide this level of growth could be significantly less and this is discussed below.

- 1.4. This report looks at the details of the four scenarios, the potential for supporting jobs, and issues around infrastructure. With different, and overlapping, time periods it is easier to assess the proposals on the basis of annual completions. The existing EEP requires allocations to deliver 2,000 dwellings per annum in the GNDP area. The JCS overallocates slightly, mostly outside the Norwich Policy Area (NPA), and allows for up to 2,100 dwellings per annum. The additional 12,000 dwellings offered in December 2008 also equates to 2,100 per annum over the 20 years 2011-2031.

2. **Consultation housing scenarios**

- 2.1. **Scenario 1 : Roll forward of the existing plan:** EERA have based these rates on the existing EEP and on the responses to the previous consultation expressed at District level and GNDP area. As we have not been in a position to advise EERA on a suitable distribution, the total for the GNDP has been split evenly between the 3 districts.

- Broadland 720 per annum
- Norwich 720
- South Norfolk 720
- GNDP 2,170

It is assumed that the GNDP figure is 2,170 rather than 2,160 due to rounding. It is higher than the 2,100 offered as the EERA model distributes an overall countywide shortfall proportionately between all Norfolk districts.

- 2.2. **Scenario 2 : National housing advice and regional settlements.** This is higher for the region as a whole. EERA have considered and rejected the advice of consultants for a regional scale concentration of growth at Norwich. Instead, additional growth is concentrated elsewhere in the region. Consequently the growth rates for the GNDP are the same as for Scenario 1.

- 2.3. **Scenario 3 : National housing advice and regional economic forecasts.** In which extra housing growth is distributed to districts forecast to have demand for additional workers. The impact of this approach is moderated as the dwelling requirement for districts in economic decline are not reduced. Nevertheless it would see significant additional growth in Broadland and a minor increase in South Norfolk:

- Broadland 840 per annum

- Norwich 720
- South Norfolk 750
- GNDP 2,310

2.4. **Scenario 4 : National household projections.** These are based on national projections for the region and are distributed to districts in proportion to the current EEP distribution.

- Broadland 750 per annum
- Norwich 850
- South Norfolk 800
- GNDP 2,400

3. **Assessment of the Scenarios**

3.1. The distribution of growth between the three districts must be evidence based. Current evidence suggests that identifiable capacity in the City Council area beyond the allocation in the JCS is limited. Growth increases the need for major new retail, employment and service development in the urban area, increasing the competition for limited brownfield opportunities. While it is likely that additional, currently unpredictable, sites will come forward in Norwich, it is clear that the growth rates for the City Council area in all four scenarios cannot be delivered over the period as a whole. The majority of further growth for the GNDP area will be in Broadland and South Norfolk and on greenfield sites.

3.2. Further evidence will be required before district allocations can be made. The forthcoming new settlement study will be a significant contribution to this. None of the scenarios provide guidance for the Norwich Policy Area. The EEP will need to provide a total provision for the NPA and an agreed distribution between district components but allowing for some local flexibility for variation based on robust evidence on delivery and sustainability.

3.3. The proposed dwelling figures relate to the period 2011-2031. The current EEP rate of 2000 per annum applies to the period from 2006. Consequently the EERA proposals make no explicit attempt to regain development “lost” through underperformance in the period 2006-2011 as a result of the recession. The GNDP actually delivered 2,200 dwellings per annum in the 2 years 2006-08 but reduced completion rates for the remaining 3 years to 2011 will almost certainly see the average considerably reduced. Therefore, to this degree Scenario 1 represents a reduction in development across the whole period from 2006.

3.4. As noted in last December’s report there is, in theory, scope to deliver 12,000 additional dwellings over the period 2011-31 taking account of:

- the 3,000 additional dwellings proposed in the Old Catton, Sprowston, Rackheath, Thorpe St Andrew growth triangle;
- further smaller scale allocations in sustainable locations in and around the urban area, towns and villages; and,

- a potential new settlement (for which a study is about to be let).

- 3.5. In addition to the above, the over-allocation in the JCS and existing commitment carried over from 2008-11 will reduce the need for new allocations. At this stage it is very difficult to be at all precise on the scale of new allocations required. However, it is quite possible that we could enter the period 2011-31 with a total commitment (including all of the growth triangle) of around 37,000 dwellings for the GNDP area as a whole. If the new EEP provision is 42,000 (2,100 per annum) then there could be a need for new allocations for around 5,000 dwellings. Once a reasonable allowance has been made for the City Council, perhaps 2,000, the level of new allocation for Broadland and South Norfolk could be quite limited. However this would be a minimum and a degree of over-allocation might be reasonable.
- 3.6. Scenarios 1 and 2 promote more growth than the GNDP previously suggested was the maximum potential. This results from lack of capacity in other parts of the County. In the absence of any clear evidence to support this approach, it is not appropriate to reallocate shortfalls in other areas to the GNDP.
- 3.7. Scenario 3 assigns additional housing growth over Scenario 1 to Broadland and South Norfolk based on the stronger economic growth potential of these Districts suggested by the East of England Forecasting Model (EEFM). However, no downward adjustment is made to the City Council area commensurate with the model's weaker growth forecasts. This approach over-inflates GNDP growth as a whole. Economic forecasting models are, at best, indicative at the district level, particularly around Norwich where recent jobs trends are distorted by cross boundary relocations (such as the N&N hospital). The flawed approach is illustrated by the EEFM itself which includes a "demand for dwellings" for the GNDP as a whole of 43,000 dwellings 2011-31 or 2,150 per annum. It is not an appropriate use of the EEFM to over-inflate district's housing targets and ignore its conclusions at the sub-regional level, particularly an area as interdependent as the GNDP.
- 3.8. Scenario 4 assigns additional growth to all three districts. This growth is simply a proportionate distribution of national household projections for the region as a whole. It takes no account of local circumstances or any regional strategy and is, in essence, "non-planning".
- 3.9. Scenarios 3 and 4 propose undeliverable levels of growth. Norwich urban area and its related Norwich Policy Area (NPA) is the core of the GNDP. All strategic employment sites and almost 90% of JCS housing growth are in the NPA. In rejecting advice for concentrating additional growth on Norwich EERA confirm that Scenario 1 growth rates for Norwich urban area "are at rates rarely achieved by any similar location in the country". This recognition highlights our previous contention that rates higher than Scenarios 1 and 2 are

simply undeliverable and untenable for the GNDP area.

4. **Jobs**

4.1. The regional East of England Forecasting Model (EEFM) has been developed to indicate potential job growth and related housing demand. The most recent “baseline” run in the Spring suggests that there will be a significant loss of jobs from a peak in 2006 to a low point in 2010. Subsequently job growth could be relatively strong. In the EEP review period 2011-2031 the baseline run indicates an increase of over 36,000 jobs in the GNDP area although, because of the downturn, the net increase in the longer period from 2006 to 2031 is only 17,000. These forecasts can take no specific account of policy interventions that will hopefully increase job growth and reduce unemployment. The JCS includes a higher target than the EEFM forecasts as it can be expected that the work to implement the JCS and the GNDP Economic Strategy will improve prospects for job growth.

4.2. The EEFM also models housing demand related to the economic assumptions and job forecasts. This indicates a “need” in the GNDP area for 43,000 dwellings 2011-31 or 2,150 per annum. This is remarkably similar to Scenarios 1 and 2 and provides some comfort that the housing growth proposed broadly aligns with potential job growth. It should be noted that the EEFM includes a lower rate of decline in household size than typically used in demographic models. To this extent the EEFM may underestimate housing need. These issues are being looked at in more detail in the next model run, due imminently.

5. **Infrastructure**

5.1. The previous response was conditional on a clearer commitment to infrastructure provision. Further evidence has emerged to help clarify needs. The Greater Norwich Infrastructure Needs and Funding Study (“the EDAW study”) looked to 2031 and took account of the potential scale of development required by the EEP Review. It indicates the scale of funding required and the potential level of developer contributions. However, it is becoming clearer that the impact of the recession on public finances and private lending will result in less public investment and more constrained developer funding, particularly in the early review period. This will be a major challenge to the delivery of the scale of growth already planned within the time period to 2026.

5.2. A wide range of infrastructure is required to deliver growth in a sustainable and acceptable way. Within this there are significant “showstoppers” without which the current scale of growth cannot be delivered, let alone any additional growth. Moreover, delayed implementation of this infrastructure will slow our current housing trajectory, phasing JCS growth to beyond 2026 and preventing additional growth in the new EEP period to 2031. These “showstoppers” are outlined below and more detail can be provided to

EERA to support this response. Other infrastructure requirements such as secondary education, while not absolutely fundamental to housing delivery, are also vital for sustainable communities and can be very expensive to resolve.

5.3. **Strategic green infrastructure.** The Appropriate Assessment (AA) process has made it clear that we need to demonstrate no significant effects on internationally significant wildlife sites. This is a legal requirement and the “precautionary principle” applies. To prevent adverse impacts from disturbance, growth will need to be supported by new green infrastructure of a scale and type that will provide alternative destinations for leisure trips. While it is not possible to define precise requirements, it is clear that significant investment will be required to ensure no adverse effect on the SACs, SPAs and Ramsar sites in and around the GNDP area. The AA also highlights issues around water resources and disposal.

5.4. **Water infrastructure:** Environmental and capacity improvements are required to several sewage treatment works to provide capacity for planned growth. In addition, strategic interceptor sewers to the north and south of Norwich are required to serve most of the currently planned growth in the NPA. Failure to provide this infrastructure will prevent development and delayed provision will impact on housing trajectories. The Water Cycle Study suggests that developer contributions will be required to fund the strategic sewers. This would be additional to the developer costs incorporated in the EDAW study and raises questions about delivery that we are currently trying to resolve. Very recent emerging evidence suggests that water supply may be a very significant constraint to current delivery. These issues are being investigated.

5.5. **The Northern Distributor Road** is the key to providing the sustainable transport infrastructure proposed in NATS and required by the JCS. It is required to relieve existing traffic congestion and provide enhanced access to strategic employment locations. It is also a “showstopper” for further growth, as without it even the current scale of growth in Broadland is undeliverable.

5.6. **A47 Southern Bypass junction improvements.** All the junctions affected by development will require improvement. The step change nature of the improvements required will be costly. Significant schemes are already required at the Longwater, Thickthorn and Postwick junctions to support existing growth locations and strategic employment sites.

5.7. **Long Stratton Bypass.** The existing growth in the JCS is dependent on the construction of this bypass.

6. **Other issues**

6.1. The EEP includes a specific policy for the Norwich Policy Area (Policy NR1). The Policy approach is generally sound but will require some

modification. It is not considered appropriate to put forward detailed changes in the absence of agreed housing numbers and further evidence (in particular the forthcoming new settlement study). However, changes that will be required include:

- updated housing provision to 2031 as agreed by the Greater Norwich Development Partnership (GNDP).
- reference to the pattern of major growth locations in the JCS, modified to take account the emerging evidence base, and in particular, the major urban extension in the Old Catton, Sprowston, Rackheath and Thorpe St Andrew growth triangle which is already planned to 2031,.
- refer to key infrastructure requirements without which growth cannot take place, including strategic green infrastructure, water infrastructure, the NDR and associated high quality public transport infrastructure, A47 Southern Bypass junction improvements and the Long Stratton Bypass
- explicit recognition of the nature of the Norwich Policy Area and the potential need for boundary review in light of the growth location strategy. Policy NR1 currently fails to recognise that the Norwich Policy Area is a small sub region and not an urban area that can grow solely by urban intensification and urban extensions has resulted in some confusion highlighted by aspects of this consultation.
- The current policy causes some difficulties in relation to the assessment of housing supply in the parts of Broadland and South Norfolk outside the NPA. To overcome this problem, Policy H1 should include agreed separate housing targets for the non-NPA parts of Broadland and South Norfolk.

- 6.2. The Appropriate Assessment (AA) under the Habitats regulations that forms part of the Interim Sustainability Appraisal is inconsistent with the AA of the JCS and is insufficient in relation to South Norfolk. It concentrates on the impact on the water environment of abstraction and disposal, and fails to consider the impact of increased visitor disturbance. It suggests that South Norfolk is less constrained in relation to internationally important sites than other Norfolk districts including Broadland and the City of Norwich. This is because it seemingly fails to recognise that the options for water resource and disposal for the majority of significant potential growth locations is the same across the three districts. The impact of increased visitor disturbance, if considered, is also broadly similar for potential growth locations in all three districts.

7. **Conclusion**

- 7.1. For the GNDP area as a whole, an additional 12,000 dwellings over the period to 2031 (i.e. 2,100 per annum) is the theoretical maximum that can be accommodated. This is a slight reduction on Scenarios 1 and 2 (and also on a reworked Scenario 3 based on the analysis of the GNDP as a whole). It is consistent with planned growth rates in the JCS. However, there is little evidence of the market's ability to deliver this level of growth and it could only be delivered in a sustainable way if it is supported by significant investment in infrastructure. Within the range of infrastructure required to ensure

growth is sustainable, there are significant requirements that are “showstoppers” that will prevent the scale of proposed development happening in the plan period or at all. The ability to fund this infrastructure in the current and foreseeable economic climate is questionable. Increased growth targets are seriously flawed if funding to deliver infrastructure can not be demonstrated. The Appropriate Assessment is inconsistent with the AA supporting the JCS and underestimates the potential for growth in the GNDP to have detrimental effects on sites of international importance.

- 7.2. Evidence supporting the proposed growth rates at the sub regional level is very limited. Some of the underlying assumptions that have been made are not applicable across the region. For example urban concentration on Norwich will require a high proportion of greenfield development. It does not automatically maximise the use of brownfield development or avoid direct impacts on rural areas and sensitive environments.
- 7.3. Higher growth Scenarios 3 and 4 for the GNDP area lack any credibility, are based on no evidence that they could be delivered, and are contrary to the limited evidence that has been developed.
- 7.4. It is not appropriate to distribute development evenly between the three districts. In particular, there is little identified scope for further development additional to that in the JCS in the City Council area. Further work is required to devise a reasonable distribution for inclusion in the EEP, although the Plan should also continue to allow for further refinement and agreement at the local level on the precise distribution between districts. The consultation displays a lack of understanding of the inter-relatedness of the three districts generally and, in particular, in the urban area and Norwich Policy Area.

Yours faithfully,



Simon Woodbridge, Leader
Broadland District Council



John Fuller, Leader
South Norfolk Council



Steve Morphew, Leader
Norwich City Council



Daniel Cox, Leader
Norfolk County Council